# RESPONSE TO COMMENTS

# PLUMPJACK SQUAW VALLEY INN EXPANSION PROJECT SQUAW VALLEY USA, CA



### RESPONSE TO COMMENTS

# PLUMPJACK SQUAW VALLEY INN EXPANSION PROJECT SQUAW VALLEY USA, CA

#### Submitted to:

County of Placer 11414 B Avenue Auburn, CA 95603 (530) 886-3000

#### Prepared by:

LSA Associates, Inc. 4200 Rocklin Road, Suite 11B Rocklin, California 95677 (916) 630-4600

LSA Project No. PLC230



June 29, 2005

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#### **CHAPTER 1.0 INTRODUCTION**

This document is a compilation of comments submitted on the Draft Environmental Impact Report (EIR) and responses to those comments. Comments have been submitted in the form of letters following the review of the Draft EIR document.

#### 1.1. FINAL EIR PROCESS

#### **Final EIR Components**

The basic Final Environmental Impact Report (Final EIR) for the PlumpJack Squaw Valley Inn Expansion consists of both the Draft EIR document, the Responses to Comments, and Mitigation Monitoring and Reporting Program. Other components (separate from the Final EIR) of the environmental review process generally include the public meeting comments, the Statements of Facts and Findings and Overriding Considerations, resolutions, staff reports, hearing minutes and official notices.

#### **Public Review of Draft EIR**

On April 15, 2004, the 45-day public review period was initiated at the State Clearinghouse. Officially, the review period ended on June 1, 2004 although several comment letters were received after that date and were included in the Final EIR. Responses are provided for each comment letter on the Draft EIR.

#### **Response Comments**

The Responses to Comments provides a record of the changes that are required in the Draft EIR, as well as responses and clarifications raised by the comment letters. Together, the Draft EIR, and the Responses to Comments record the environmental review process and findings, from the issuance of the Notice of Preparation, through the document certification.

The Responses to Comments include the original comment letter submitted by the commenting party (citizen, agency, etc.) followed by the EIR response. To facilitate reader convenience, each comment has been assigned a comment code, with each response linked by the same code. Due to the similarity or duplication of some comments, the reader may be referred to a previous (or subsequent) response provided elsewhere in the Response Comment portion of the Final EIR.

#### **Decision-Makers Roles**

The Planning Commission and Board of Supervisors will need to review the Responses to Comments and revised Final EIR in conjunction with their decisions on the proposed Conditional Use Permit, Tentative Map, Variance and Design Review approval, and other decisions subject to environmental review in conjunction with the Final EIR. The Planning Commission will make a recommendation to the Board of Supervisors as to its adequacy and completeness of the Final EIR. Both the Planning Commission and Board of Supervisors and will use the information to understand the range of potential impacts due to the project in making their decision on the project.

#### 2.0 RESPONSES TO COMMENTS

#### 2.1 WRITTEN COMMENTS AND RESPONSES

The section that follows includes the comment letters submitted by various public agencies and private parties, and the responses to those comments. Commentors on the Draft EIR for the PlumpJack Squaw Valley Inn Expansion project are listed follows:

Placer County Flood Control and Water Conservation District (June 1, 2004)

Town of Truckee Community Development (May 28, 2004)

Squaw Valley Public Service District (May 27, 2004)

Squaw Valley Ski Corps (June 1, 2004)

H. Spencer Bloch, MD (May 15, 2004)

Squaw Valley Tram Condominium Association (May 25, 2004)

McDermott, Will and Emery (May 19, 2004)

Granite Peak Management (May 26, 2004)

Wajih and Nayla Sleiman Squaw Valley Lodge (May 22, 2004)

Fred Ilfeld Jr. (May 30, 2004)

Pamela Rocca (May 31, 2004)

John Chisholm (May 27, 2004)

Regional Water Quality Control Board, Lahontan Region (May 28, 2004)

Jack Schafer (May 12, 2004)

Daniel B. Hrdy, M.D. (May 13, 2004)

Ken N. Olcott (May 11, 2004)

Werner Goese (May 11, 2004)

John A. Barnhart (May 12, 2004)

Donald E. Smith (May 11, 2004)

Todd Elmgren (May 18, 2004)

Donald Druyanoff (May 17, 2004)

Robert J. Loarie (May 18, 2004)

H. Spencer Bloch (July 16, 2003)

Hoagan & Esther Lew (May 27, 2004)

Cecilia & John Plough (May 24, 2004)

Chris Kocher (May 25, 2004)

Mark Whitlow and Reetta Raag (May 27, 2004)

Diane Lowery (May 28, 2004)

Charles G. McKeag (May 28, 2004)

Kenneth & Irene Wong (May 28, 2004)

Judith and Brad O'Brien (May 27, 2004)

Russ Westover (May 26, 2004)

John and Connie Wong (May 28, 2004)

James A. and Kathryn Schuyler (June 1, 2004)

John and Susan Massey (May 29, 2004)

Caltrans, Jeffrey Pulverman, (June 2, 2004)



# PLACER COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

Tim Hackworth, Executive Director Brian Keating, District Engineer Andrew Darrow, Development Coordinator

June 1, 2004

Lori Lawrence Placer County Planning Department 11414 B Avenue Auburn, CA 95603 JUN 0 2 2004

PLANNING DEPT

RE: PlumpJack Squaw Valley Inn Expansion / Draft EIR

Dear Lori:

We have reviewed the Draft EIR (DEIR) dated April 8, 2004 for the subject project and have the following comments.

The applicant is adequately proposing mitigation measures for the project's increases in peak flow rates. Per the DEIR, the project will include the construction of one detention basin that will attenuate runoff for the 2-, 10-, 25-, and 100-year storm events.

A detailed review of the hydrology and hydraulic analysis will be performed during the improvement plan phase of the project.

PCFCD-1

We have no additional concerns regarding the subject project at this time. Please call me at (530) 889-7541 if you have any questions regarding these comments.

Andrew Darrow, P.E. Development Coordinator

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### **RESPONSE COMMENTS**

# **Placer County Flood Control And Water Conservation District**

PCFCD-1

Comment noted. No response necessary.

Josh Susman, Mayor

Craig Threshie, Vice Mayor

Ronald Florian, Councilmember Ted Owens, Councilmember Beth Ingalls, Councilmember



Stephen L. Wright, Town Manager
Alex Terrazas, Assistant to the Manager
David M. Heath, Administrative Services
Judy Price, Town Clerk
J. Dennis Crabb, Town Attorney
Scott Berry, Chief of Police
Tony Lashbrook, Community Development
Daniel P. Wilkins, Public Works Director/Town
Engineer

May 28, 2004

Michael Wells Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603

RE: Draft Environmental Impact Report for the PlumpJack Squaw Valley Inn Expansion

Dear Mr. Wells:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DIER) for the PlumpJack Squaw Valley Inn Expansion. The Town of Truckee is committed to a communicative approach to the Tahoe Basin's growing needs.

Based on the DEIR, the Town of Truckee as well as other surrounding jurisdictions will be impacted by the scope of the proposed project. Although a majority of the impacts will be less than significant with the incorporation of mitigation measures, a few sections of the DEIR do not appear to be legally sufficient, specifically, the Housing and Transportation/Circulation sections. Please include the following comments as part of the Final Environmental Impact Report:

#### Housing

It's not clear from the DEIR how many employees are currently employed at the PlumpJack Squaw Valley Inn, but through the expansion, 6 new employees will be added. Pursuant to the Placer County General Plan, new resorts in the Lake Tahoe area are required to provide for employee housing equal to 50% of the housing demand generated for the project. The developer may pay an in-lieu fee as opposed to providing the required units. The developer is proposing to pay an in-lieu fee for 3 employees in addition to maintaining the existing housing supply for 8 employees.

T-1

The Town of Truckee submitted comments on the Village at Squaw Valley Final EIR in October of 1999, the comments of which were directed at the project's impacts on the Region's increasingly scarce housing supply, particularly affordable housing for service industry workers. It appears that the DIER for the expansion fails to address the same areas relative to housing that were previously raised by the Town in 1999:

- 1. The proposed project will provide 34 high-end condominium-type units (identified as multi-family units through the document) and 28 additional lodging units (identified as "lock-out" units through the document). Nowhere in the project discussion does the DEIR indicate the number of existing employees, how the existing units are affordable or how they are restricted to employees only. Although one 4-bedroom unit is available, Section 3.10.1 (pp.121) is not clear about the other units-is it a duplex, or is it three apartments? How many bedrooms are there? Often resort provided housing is T-1 substandard and by no means affordable to a person making minimum wage. There is no discussion of socioeconomics within this section and the later growth-inducing impact discussion section (pp. 152-153) is vague about the Tahoe Basin's rising cost of living, current rental/real estate market and how the payment of an in-lieu fee, although allowed, will ensure affordable housing. Although the proposed project does not conflict with any Town of Truckee General Plan goals or policies, region-wide cumulative impacts will occur with every development in Squaw Valley.
- 2. The DIER does not address what the assumed affordable housing in-lieu fees will be, or how the fees are assumed to provide for affordable housing. Although the in-lieu fee may be a significant amount or money, the DEIR fails to address per unit construction costs, the County's future plans for affordable housing developments and whether or not this fee will be adequate in a region-wide context; the Town looks forward to seeing affordable housing units on the ground whenever possible.

#### Traffic and Circulation

The Town of Truckee's primary traffic and circulation concerns revolve around the lack of proposed mitigation measures related to traffic flow to, from and within the Truckee Town limits. Particularly, the lack of proposed mitigation measures related to improvements along the SR 89 corridor at the SR 89/UPRR under crossing ("the Mousehole") and the SR 89/I-80 interchange. The Town's position requires that this project mitigate traffic impacts throughout the entire affected region, not just in Placer County. Therefore, it would be justifiable and appropriate to tie a fair-share portion of mitigation fees to the following capital projects as part of the mitigations identified in the project DEIR.

1. The Mousehole - The Town of Truckee, the Nevada County Transportation Commission, and the Placer County Transportation Commission are currently exploring funding sources for capacity enhancements at the Mousehole. Initial studies performed on the Mousehole have identified both two and four lane road and bridge construction alternatives that would significantly improve pedestrian and vehicle safety and flow on this section of State Route 89. The State Route 89/Union Pacific Railroad Grade Separation Feasibility Analysis Report considered a range of options to improve pedestrian and traffic circulation in this area. Conclusions of this report identify that it may be possible to accommodate future traffic loads with an improved two lane cross section, which would require an additional or replacement structure to the existing Mousehole.

T-3

The report is clear that the existing structure is deficient in accommodating existing and future traffic demand. Impacts of this project to the traffic flow at the Mousehole could be mitigated through fair-share funding contributions to the improvement of the Mousehole.

The Town of Truckee estimates the improvement to the Mousehole to cost \$10M of which the Town estimates \$3M will need to be funded through AB 1600 funds. A fair-share contribution to funding this project should be identified in the DEIR's traffic mitigation.

2. <u>I-80 Interchange at SR 89</u> – Similar to the Mousehole, capacity deficiencies exist at the I-80/SR 89 interchange ramps. The Town of Truckee is working with CalTrans to construct two modern roundabouts at this location. The cost of these roundabouts is estimated at \$3.25M, of which the Town of Truckee has committed to pay \$2.5M.

Since these roadway improvements will clearly benefit not only Truckee traffic, but traffic in the entire Tahoe region (Squaw Valley traffic in particular), this development project should be required to pay a fair-share contribution as part of the DEIR traffic mitigation.

Currently, the Town of Truckee and Placer County are working together to develop a Joint Traffic Impact Fee Program that will help fund any unmitigated cumulative traffic and circulation impacts and simplify our efforts in determining "fair-share" traffic mitigation funds owed to the Town for developments in Placer County. However, since this program has not yet been implemented and since the project applicant will be required to pay \$98,048 in traffic impact fees to Placer County, it would be appropriate to earmark a portion of those funds to the capital improvement projects identified above. It should be noted that the project DEIR projects that 63 percent of project generated traffic will have origins and destinations within, or through, the Town of Truckee along the SR 89 corridor.

Thanks you again for the opportunity to comment on this project. We look forward to working with you on these issues. Should you have any questions please fell free to contact me at (530) 582-7820.

Sincerely,

Kony Lashbrook

Community Development Director

Cc: Truckee Town Council Members

#### RESPONSE COMMENTS

#### **Town Of Truckee, Community Development**

#### Response T-1

Comment noted. The developer will comply with the Placer County Housing Ordinance that is in place at the time the Conditional Use Permit is issued. At this time, Placer County is in the process of preparing an Ordinance that will establish requirements for affordable housing.

Page 121 has been revised from, "This duplex houses another four employees, for a total of eight persons housed" to "This triplex may house four employees. The triplex consists of one 2-bedroom unit and two 2-bedroom units. A total of eight persons may be housed." This housing is offered as part of an employment package provided by the PlumpJack Squaw Valley Inn. Housing to employees is currently offered at rates that are consistent with the affordable price for low to moderate income levels based on Placer County's median income of \$52,900 in 2000 (Placer County Redevelopment Agency 2001:21). The EIR has been revised to include this reference "Placer County Redevelopment Agency, North Lake Tahoe Redevelopment Implementation Strategy 2001-2006. April 2001." Compliance with the Placer County affordable housing ordinance will be addressed in the projects' conditions of approval for the use permit.

Section 4.1 Growth inducing impacts is required by Section 15126 to discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. This section is intended to discuss the possibility of the project removing any obstacles to population growth or impacts on community service facilities which would require construction of new facilities that could cause significant environmental effects. This section also discusses the characteristic of some projects which may encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively. The cost of real estate in Squaw Valley is not applicable to this section. Please refer to Section 3.10 for discussion of employee housing.

#### Response T-2

See also the first paragraph of response T-1. According to Joanne Auerbach at the Placer County Redevelopment Agency, in-lieu fees may be determined by Placer County, but the fee amount is determined during the Use Permit process. Payment of the in-lieu fee would be listed on the use permit as a condition of approval. Please note that Joanne Auerbach, Housing Program Coordinator, Placer County Redevelopment Agency was added to the list of persons consulted. According to the Placer County Redevelopment Agency, a per unit cost per affordable housing unit is not available at this time.

#### Response T-3

The revised traffic study will identify the project's fair-share contribution to the two capital projects listed above, as a part of the DEIR traffic mitigation. According to County staff, the contribution to the I-80 Interchange at SR 89 will be based on the original cost estimate for signalization (not roundabouts).

Response T-4 See response T-3.

Response T-5 According to County staff, the project applicant's contribution to projects in Truckee are made in addition to the fee determined by the County Traffic Fee Program.



### SQUAW VALLEY PUBLIC SERVICE DISTRICT

1810 Squaw Valley Road Post Office Box 2026 Olympic Valley, CA 96146-2026

Phone: (530) 583-4692 FAX: (530) 583-6228

May 27, 2004

Ms. Lori Lawrence Planning Technician Placer County Planning Department 11414 B Ave. Auburn, CA 95603 JUN 0 1 2004

PLANNING DEPT.

RE:

PlumpJack Squaw Valley Inn Expansion Project

Draft EIR For Review

Dear Ms. Lawrence:

Thank you for providing the opportunity for Squaw Valley Public Service District (District) to respond to the above project. We have the following comments.

# Comments on Draft EIR for PlumpJack Squaw Valley Inn Expansion Project

 Page 9 – mitigation measure FC-3b indicates drainage within the parking structure will be collected in floor drains and discharged to the sanitary sewer.

The District cannot allow discharge of drainage from the parking structure to discharge to the sanitary sewer due to the potential for surcharging the sewer system.

SVPS-1

 Page 9 – mitigation measure WQ-1a indicates that a drainage system will be designed that includes a detention basin lined with an impervious clay admixture in order to deter infiltration of stormwater into the drinking water aquifer.

SVPS-2

The detention basin must be designed with an impermeable liner as required to <u>eliminate</u> any potential for stormwater infiltration into the aquifer.

 Page 17 – Impact WW-1 and Mitigation Measure WW-1a indicates that existing sewer lines located at the rear of the property will need to be relocated to Squaw Peak Road.

There may be problems with grade and conflicts with other utilities for the proposed sewer line relocation. The District requires that the relocation must maintain a SVPS-3 gravity sewer system. No pumping will be allowed.

Also, sewer line setbacks to the proposed drinking water well and waterlines must maintain setbacks required by California Department of Health Service regulations.

 Page 19 – mitigation measure FP-1 uses the term Squaw Valley Fire Protection District.

Fire service in the Valley is provided by the Squaw Valley Public Service District through the Squaw Valley Fire <u>Department</u>, which is a department within the District.

SVPS-4

 Page 35 – Impact LU-1 item (d) indicates that "The well will be designed to meet all State and County Health Department requirements."

In anticipation of the well being dedicated to the District, the well design shall also be  $_{\rm SVPS-5}$  acceptable to the District.

 Page 44 – Section 3.3.3 indicates the project will include construction of one detention basin lined with a layer of impervious soil created by a clay admixture in order to "deter" infiltration of the stormwater into the drinking water aguifer.

The detention basin must be designed with an impermeable liner as required to eliminate any potential for stormwater infiltration into the aquifer.

SVPS-6

 Page 47 – Item 4.E.1 indicates that the proposed project will include a detention basin which the "local water authority requires that it be lined with an impervious liner to prevent contamination of groundwater..."

The detention basin must be designed with an impermeable liner as required to <u>eliminate</u> any potential for stormwater infiltration into the aquifer.

SVPS-7

 Page 48 – Item 4.E.9 once again makes reference to "deter" infiltration of stormwater into the drinking water aquifer.

The detention basin must be designed with an impermeable liner as required to <u>eliminate</u> any potential for stormwater infiltration into the aquifer.

SVPS-8

 Page 50 – Item 4.F.12 once again makes reference to "deter" infiltration of storm water into the drinking water aquifer.

The detention basin must be designed with an impermeable liner as required to <u>eliminate</u> any potential for stormwater infiltration into the aquifer.

 Page 51 – Impact FC-2 indicates that "Drainage within the parking structure will be collected in floor drains and discharged to the sanitary sewer."

The District cannot allow discharge of drainage from the parking structure to discharge to the sanitary sewer due to the potential for surcharging the sewer system.

SVPS-10

 Page 51 – Impact FC-2 once again makes reference to "deter" infiltration of stormwater into the drinking water aquifer.

The detention basin must be designed with an impermeable liner as required to <u>eliminate</u> any potential for stormwater infiltration into the aquifer.

SVPS-11

 Page 53 – Impact WQ-1 once again makes reference to "deter" infiltration of stormwater into the drinking water aquifer.

The detention basin must be designed with an impermeable liner as required to <u>eliminate</u> any potential for stormwater infiltration into the aquifer.

SVPS-12

 Page 118 – Section 3.9.1 references a former leaking underground storage tank on the PlumpJack property.

The EIR must also consider the effect of a previous contamination site at the Squaw Valley Lodge, which is currently closed but needs to be recognized and considered as part of this project.

SVPS-13

 Page 119 – Section 3.9.1 indicates concentrations of TPHd less than 100 μg/L to be classified as non-detect.

Is this with respect to the drinking water standard? If not, what standard classifies a <sub>SVPS-14</sub> concentration of less than 100 μg/L to be non-detect?

 Page 120 – mitigation measure HAZ-1b indicates that if contaminated soil is present in the project area, it will be removed of to non-detect levels.

Is the non-detect level 100 µg/L as referenced previously? Is this protective of potential contamination of groundwater? What about treatment for groundwater contamination?

• Page 123-124 – Section 3.11 Utilities – talks about the <u>Squaw Valley Groundwater</u> <u>Development and Utilization Feasibility Study</u> written in October 2001.

The sustainable yield of 1,640 acre-feet annually does not accurately reflect the sustainable yield provided in the <u>Squaw Valley Groundwater Development and Utilization Feasibility Study **Update** dated August 2003. The updated study estimates the sustainable yield at 1524 acre-feet.</u>

SVPS-16

 Page 125 – Section 3.11.3 provides a water usage of approximately 5,840 gallons per day of domestic and irrigation water for 34 multi-family residential units and 28 lock out units. The water demands are based on an average of 40% occupancy throughout the year.

What are the water demand factors used in developing this estimated water demand and how do they compare to the District's demand factors for similar land use?

SVPS-17

Also, how does 40% occupancy compare to other developments in year round comparable destination/resort areas?

 Page 126 –127 Section 4.C.1 states that a study conducted by Kleinfelder, included in Appendix G, shows that it is possible to convert this irrigation well to a drinking water well from a water quality standpoint.

A complete Safe Drinking Water Act water quality analysis would need to be performed to verify this assumption. The water quality analysis in Appendix G is not sufficient to make such a statement. Further testing, including a complete Title 22 analysis, must be completed to make such a determination.

SVPS-18

 Page 127 – Section 4.C.2 indicates that the project proponent will dedicate the existing irrigation well to the SVPSD once the well is "modified".

The District does not support modifying the existing 15 year old well. The District requests that the well be re-drilled and equipped to the District's satisfaction and to California Department of Health Services standards. The District is concerned with the age and construction materials of the well. Specifically, the District is concerned with future maintenance of the well due to its age and location within the proposed high density development, which would inhibit cost effective maintenance and future replacement of the existing well.

Page 128-129 – Impact WAT-1 discusses a minimal impact on the existing
groundwater supply, Squaw Creek or other wells in the area, if the well is pumped to
supply PlumpJack demands only. It also indicates that the PlumpJack well could be
operated to supply water beyond the needs of the project site, but would need to be
operated in coordination with other production wells in the basin.

The District would accept a well that was equipped to pump at its design capacity.

The well would be brought online to meet the estimated PlumpJack demand and operated in coordination with other production wells in the basin.

To utilize this well for demands other than PlumpJack, a more extensive analysis of the effects of increased pumping will need to be undertaken to address aquifer recharge and Squaw Creek impacts, particularly in the summer and fall months.

 Page 129-Impact WW-1 existing sewer lines located at the rear of the property will not be accessible once the project is constructed.

There may be problems with grade and conflicts with other utilities for the proposed sewer line relocation. The District requires that the relocation must maintain a SVPS-21 gravity sewer system. No pumping will be allowed.

Also, sewer line setbacks to the drinking water well and waterlines must maintain setbacks required by California Department of Health Service regulations.

 Page 130 – Section 3.11.4 indicates that the PlumpJack hydrogeology study concluded that conversion of the existing irrigation well to a drinking water well can be achieved without creating a significant effect to the aquifer or Squaw Creek.

This condition would exist only if the well was pumped to supply the PlumpJack development only.

SVPS-22

## Appendix F - Groundwater Monitoring Report

 In general, the Groundwater Monitoring Report July 2002 prepared by Geocon Consultants, Inc. does not provide a discussion of other past contamination sites in the direct vicinity of the project.

The EIR must provide a discussion of, and consider past, contamination sites in the direct vicinity of the project, including the Squaw Valley Lodge and Olympic House Loading Dock sites.

# <u>Appendix G – Groundwater Development and Utilization Feasibility Study; Aquifer Testing and Impact Analysis</u>

The attached study is dated October 2001

A Groundwater Development and Utilization Feasibility Study **Update** was prepared <sub>SVPS-24</sub> in August 2003 and must be made a part of this EIR.

# Appendix G –Revised Results of Aquifer Testing and Impact Analysis PlumpJack Irrigation Well prepared by Kleinfelder

 This report described three water supply scenarios for the PlumpJack irrigation well: pumping for PlumpJack's expansion only (10 gpm), PlumpJack's expansion and Intrawest Phases 3 and 4 (57 gpm), and the maximum well pumping rate of 142 gpm.

The District would accept a well that was equipped to pump at its design capacity of 142 gpm. The well would be brought online to meet the PlumpJack demand and operated in coordination with other production wells in the basin.

To utilize this well for demands other than PlumpJack, a more extensive analysis of the effects of increased pumping will need to be undertaken to address aquifer recharge and Squaw Creek impacts, particularly in the summer and fall months.

Also, Kleinfelder's demand estimate for Intrawest Phase 3 and 4 of 47 gpm, or 67,945 gallons per day, differs greatly from water demand estimates prepared by Intrawest's consultant, Auerbach Engineering Group, which estimated demands for Phase 3 and 4 at 122,000 gallons per day (85 gpm).

 This report discusses the pumping capacity of the well declined from a sustainable pumping rate of 200 gpm prior to well rehabilitation to 142 gpm after well deepening and rehabilitation. Also indicated is that the well has a sanding problem.

The District does not support modifying the existing 15 year old well. The District requests that the well be re-drilled and equipped to the District's satisfaction and to California Department of Health Service standards. The District is concerned with the age, condition and construction materials of the well. The current sanding problem with the well is cause for redrilling the well.

The Kleinfelder report states that simulated impacts to flows in Squaw Creek were minimal even under a continuous pumping rate of 142 gpm for three years.

In the memorandum dated September 12, 2003, from Derrik Williams to Mr. Rob Goldberg/PlumpJack, Mr. Williams concludes that "The data are insufficient to extract conclusions about aquifer-stream interactions using common analytical aquifer test solutions." The memorandum also states that "..the pumping the PlumpJack well to supply the Intrawest development, or at a maximum pumping rate, will result in a noticeable impact to water levels in well SVPSD#2".

SVPS-27

The Derrik Williams memorandum does not specifically support Kleinfelder's conclusions on this matter.

The Kleinfelder report states that "simulated impacts on hydrocarbons in groundwater east of PlumpJack Squaw Valley Inn plume were also minimal even under continuous IW pumping rate of 142 gpm for three years."

This statement is in direct contradiction to the Derrik Williams memorandum which states that "... higher pumping rates may have some influence on the flow direction SVPS-28 of PlumpJack's estimated hydrocarbon plume." The memorandum also states that "We recommend that the known hydrocarbon plumes be rigorously monitored if the PlumpJack well is operated for water supply."

As a condition of approval for the District accepting the PlumpJack well for domestic water use, early warning monitoring wells around the well would be required to detect possible hydrocarbon contamination.

### Appendix G - Memorandum dated September 12, 2003 from Derrik Williams to Mr. Rob Goldberg/PlumpJack

This memorandum states that pumping the PlumpJack well to supply Intrawest Phase 3 and 4, or at the maximum pumping rate of 142 gpm, will result in a noticeable impact to water levels in well SVPSD#2. The memorandum also suggests that coordinated pumping between the PlumpJack well and other water supply wells in the basin will be necessary to provide for anything more than the PlumpJack demand.

> Modifications to well SVPSD#2 (District Well #2) can make it possible to increase the pumping rate for the PlumpJack well. Any modifications to District Well #2 for SVPS-29 the purpose of increasing capacity at the PlumpJack well would be the responsibility of others. Also, further study would be required addressing recharge to the PlumpJack well in the summer and fall months.

The memorandum implies that the higher pumping rates on the PlumpJack well may have some influence on the flow direction of the PlumpJack's estimated hydrocarbon plume.

The Kleinfelder report contradicts this statement and concludes that "Simulated impacts on hydrocarbons in groundwater east of PlumpJack Squaw Valley Inn plume were also minimal even under a continuous IW pumping rate of 142 gpm for SVPS-30 three years." The Kleinfelder report used the Derrik Williams memorandum to reach their conclusions.

The memorandum recommends that the known hydrocarbon plumes be rigorously monitored if the PlumpJack well is operated for water supply.

As a condition of approval for the District accepting the PlumpJack well for domestic water use, early warning monitoring wells around the well would be required to determine hydrocarbon contamination.

SVPS-31

The memorandum states that the PlumpJack well has little impact on the simulated flows on Squaw Creek during high flow months, but as the simulated flows in the Creek diminish, the relative impact of the pumping increases.

The Kleinfelder report contradicts this and states that "simulated impacts in Squaw Creek were minimal even under a continuous IW pumping rate of 142 gpm for three years.

Thank you for your consideration of the above comments. Should you have any questions please feel free to contact Dave Hunt at ECO:LOGIC at (775) 689-0101, or me.

Sincerely,

Richard L. Lierman General Manager

RLL/ld

cc: Squaw Valley Public Service District Board of Directors

Dave Hunt, ÉCO:LOGIC

Ed Heneveld, Squaw Valley Municipal Advisory Council

#### **RESPONSE COMMENTS**

#### **Squaw Valley Public Service District**

#### Response SVPS-1

The floor drains in question are inside the parking structure (under the building). Drainage outside the building will drain into the stormdrain system and not into the parking structure. Consequently, the floor drains will not collect any stormwater. The floor drains will only collect water from washing the floor of the parking structure. This wash water should be discharged to the sanitary sewer (similar to any floor drain inside the building). Mitigation measure FC-3b remains unchanged.

#### Response SVPS-2

The detention basin will be designed with an impermeable liner to eliminate any potential for stormwater infiltration into the aquifer. Mitigation Measure WQ-1a on page 9 of the DEIR has been revised from "Design a drainage system that includes a detention basin (lined with an impervious clay admixture soil layer in order to deter infiltration of stormwater into the drinking water aquifer) storm water filtration facilities, and stormwater conveyance to catch and treat stormwater in accordance with RWQCB and Placer County standards prior to being discharged to Squaw Creek." to "Design a drainage system that includes a detention basin (lined with an impervious clay admixture soil layer in order to eliminate any potential for infiltration of stormwater into the drinking water aquifer) storm water filtration facilities, and stormwater conveyance to catch and treat stormwater in accordance with RWQCB and Placer County standards prior to being discharged to Squaw Creek." This revision was made throughout the document as applicable.

#### Response SVPS-3

Comment noted. The relocated sewer line will be a gravity sewer system. Sewer line setbacks to the proposed drinking water well and waterlines will maintain setbacks as required by the California Department of Health Services.

#### Response SVPS-4

Comment noted. The language was changed from "The plan was reviewed by Squaw Valley Fire Protection District for adequate circulation and facilities" to "The plan was reviewed by Squaw Valley Fire Department, which is a department within the Squaw Valley Public Service District, for adequate circulation and facilities.

This was also revised in Section 3.13.3. Mitigation Measure FP-1 now reads, "The plan was reviewed by Squaw Valley Fire Department, which is a department within the Squaw Valley Public Service District, for adequate circulation and facilities." The following sentence was also revised from, "The developer will be required to get approval from the Squaw Valley Fire Protection District prior to building permit issuance" to , "The developer will be required to get approval from the Squaw Valley Fire Department prior to building permit issuance."

#### Response SVPS-5

The language has been changed from "The well will be designed to meet all State and County Health Department requirements" to "The well will be designed to meet all State and County Health Department requirements, and in anticipation of the well being dedicated to the District, the well shall also be designed to meet Squaw Valley Public Service District requirements."

#### Response SVPS-6

Comment noted. Please see response SVPS-2.

#### Response SVPS-7

The language was changed from, "The project proposed to use a detention basin on the site, however, the local water company requires that it be lined with an impervious liner to prevent contamination of groundwater" to "The project proposed to use a detention basin on the site, however, the local water company requires that it be lined with an impervious liner to eliminate any potential for stormwater infiltration into the aquifer."

#### Response SVPS-8

Comment noted. See response SVPS-2. Item 4.E.9 has been revised.

#### Response SVPS-9

Comment noted. Language in Item 4.F.12 was changed from, "The basin will be lined with an impervious liner according to Squaw Valley Public Service District's requirements, to "The basin will be lined with an impervious liner to eliminate any potential for stormwater infiltration into the aquifer in accordance with Squaw Valley Public Service District's requirements.

#### Response SVPS-10

Comment noted. See response SVPS-1.

#### Response SVPS-11

See response SVPS-2. Impact FC-2 has been revised.

#### Response SVPS-12

See response SVPS-2. Impact WQ-1 has been revised.

#### Response SVPS-13

Comment noted. The following language has been added in Section 3.9.1. "During construction of the Squaw Valley Lodge located at 201 Squaw Valley Peak Road, soils containing diesel and oil range petroleum products were found at the start of grading. Approximately 5,000 cubic yards of petroleum-contaminated soil were removed from the project site. Three groundwater monitoring wells were installed, and groundwater monitoring and sampling activities were conducted from December 1999 through May 2002. Testing results did not reveal any incidences above the taste and odor threshold of 100 micrograms per Liter. On October 11, 2002, The California Regional Water Quality Control Board issued a letter stating that no further action was required for this site."

Please refer to Mitigation Measure HAZ-1a and Mitigation Measure HAZ-1b on page 120.The implementation of the mitigation measures will bring impacts associated with the presence of contaminated soil or groundwater to less than significant levels.

#### Response SVPS-14

Comment noted. 100 micrograms per liter is not a standard, but rather a level at which the instrumentation can detect concentrations of Total Petroleum Hydrocarbons (Diesel) (TPHd). The Groundwater Monitoring Report dated July 2002 is located in Appendix F and contains the data reports prepared by Zymax for analysis of water samples. Zymax refers to this detectable level as the Practical Quantitation Limit (PQL). Results that are below the Practical Quantitation Limit are classified as Non-Detect (ND).

#### Response SVPS-15

100 micrograms per liter is not a standard, but rather a level at which the instrumentation can detect concentrations of Total Petroleum Hydrocarbons (Diesel) (TPHd). The State of California and/or the US Environmental Protection Agency (USEPA) have set primary and secondary drinking water standards. The primary drinking water standards do not address Total Petroleum Hydrocarbons (Diesel) (TPHd), but secondary drinking water standards have been set by the State of California for taste and odor of all constituents at a maximum contaminant level. This standard is 100 micrograms per liter for Total Petroleum Hydrocarbons.

Mitigation measures Haz 1a and Haz 1b are to mitigate the impact of encountering contaminated soil or groundwater during grading. The language of Haz-1b has been changed from, "If contaminated soil is present in the project area, it will be removed to non-detect levels and disposed of or treated to acceptable levels according to California and Nevada State law if applicable and Placer County requirements" to "If contaminated soil or groundwater is present in the project area, it will be removed to non-detect levels and disposed of or treated to acceptable levels according to California and Nevada State law if applicable and Placer County requirements."

#### Response SVPS-16

Comment noted. The information in this Draft EIR is based on information available at the time the Notice of Preparation was filed. The notice for this project was filed in December of 2001 and the Squaw Valley Groundwater Development and Utilization Feasibility Study dated October 2001 was the document available at that time. Including the revised study or revising text within the Draft EIR to reflect the revised report is not considered appropriate since the notice of preparation was filed prior to the release of the revised report. Although the study in the appendix will not be updated for this document, copies of this document are available for review at the Squaw Valley Public Service District. This office is located at 1810 Squaw Valley Road in Olympic Valley.

It is noted that the Squaw Valley Groundwater Development and Utilization Feasibility Study dated August 2003 estimates the sustainable yield at 1,524 acre-feet. This difference is considered a marginal effect and does not influence the conclusions in this section.

#### Response SVPS-17

The Draft EIR states that the maximum water use will be 14,600 gallons per day (GPD) in August with an average use of 5,840 gpd. This represents a 40% occupancy rate.

The groundwater model simulation used a maximum use of 14,600 gallons per day (gpd) in August with a higher average use of 7,539 gpd. This represents a 51.6% occupancy rate. The groundwater simulation distributed the demand in accordance with Table 5-11 of the Squaw Valley Groundwater Development & Utilization Study (West Yost & Associates, 2001). PlumpJack records for the last

six years indicate an average occupancy rate of 50% with the highest occupancy in the winter. Please see PlumpJack occupancy rates in the chart below.

Occupancy %	1998	1999	2000	2001	2002	2003	2004
January	57%	54%	50%	58%	68%	57%	62%
February	67%	74%	74%	54%	81%	64%	66%
March	64%	80%	86%	68%	77%	59%	72%
April	58%	33%	65%	48%	39%	46%	34%
May	36%	37%	41%	30%	39%	27%	33%
June	49%	42%	39%	44%	52%	49%	40%
July	57%	65%	57%	46%	43%	49%	
August	69%	62%	52%	50%	44%	54%	-
September	56%	60%	51%	25%	35%	51%	
October	36%	36%	42%	40%	29%	32%	-
November	21%	20%	24%	34%	27%	30%	
December	55%	61%	54%	58%	52%	61%	
1 <sup>st</sup> Quarter	63%	69%	70%	60%	75%	60%	67%
2 <sup>nd</sup> Quarter	48%	37%	48%	41%	43%	41%	36%
3 <sup>rd</sup> Quarter	61%	62%	53%	40%	41%	51%	
4 <sup>th</sup> Quarter	37%	39%	40%	44%	36%	41%	
Year Total	52%	52%	53%	46%	49%	48%	26%

The DEIR and the groundwater simulation include 2,500 gpd of irrigation pumping in August with average irrigation pumping of 1,000 gpd. Irrigation pumping has occurred over the last 15 years using the existing irrigation well. Therefore, the additional water use for the project has been reduced by 2,500 gpd during August and by an average of 1,000 gpd. The additional water use for the project has also been changed to reflect the PlumpJack occupancy percentages as follows:

The language in Section 3.11.3 has been changed from, "The project proposes to use approximately an average of 5,840 gallons per day of domestic and irrigation water and produce approximately 4,840 gallons per day of wastewater. These numbers are estimated based on an average of 40% occupancy throughout the year" to "The project proposes to use approximately an average of 7,300 gallons per day of domestic and irrigation water and produce approximately 6,300 gallons per day of wastewater. These numbers are estimated based on an average of 50 % occupancy throughout the year."

The following sentence was also added to the second paragraph of this section, "However, the actual occupancy data from the existing Squaw Valley Inn indicate that summer occupancy has not exceeded 69% from 1998 to 2003."

#### Response SVPS-18

The laboratory analytical reports include results for all inorganic compounds (IOC), volatile organic compounds (VOC), and radionuclides (alpha and beta) required under Title 22 in 2001. These analyses are included in the Groundwater Monitoring Report in the appendix. These analyses are in compliance with Title 22 for the parameters analyzed. A complete Title 22 analysis will be performed on a new well drilled adjacent to the existing irrigation well.

#### Response SVPS-19

Comment noted. Mitigation measure WAT-1c will be added to state, "A new well will be drilled and equipped to SVPSD and State of California Department of Health Services (CDHS) specifications"

#### Response SVPS-20

A more extensive analysis of the effects of increased pumping will be undertaken if the new well is used to supply water beyond the needs of the PlumpJack expansion project. This extensive analysis will address aquifer recharge and Squaw Creek impacts, will include direct monitoring of creek flows, and will be undertaken during the summer and fall months.

The sentence, "The development of this well may result in additional water supply that can assist the Squaw Valley Public Service District in meeting future needs of Squaw Valley "was changed to, "A more extensive analysis of the effects of increased pumping will be undertaken if the new well is used to supply water beyond the needs of the PlumpJack expansion project. This extensive analysis will address aquifer recharge and Squaw Creek impacts, will include direct monitoring of creek flows, and will be undertaken during the summer and fall months."

#### Response SVPS-21

See response SVPSD-3.

#### Response SVPS-22

The new PlumpJack well will be utilized to only supply the needs of the PlumpJack expansion project until additional analysis of the effects of increased pumping beyond the needs of the PlumpJack expansion project is completed.

#### Response SVPS-23

Comment noted. The Groundwater Monitoring Report does not provide information on the Olympic House Loading Dock site or the Squaw Valley Lodge contamination. Please refer to comment SVPS -13 for comments on the Squaw Valley Lodge previous contamination.

#### Response SVPS-24

Comment noted. See response SVPS -16.

#### Response SVPS-25

Comment noted. Please see response SVPS -20. During the extensive analysis, demand estimates for Intrawest Phase 3 and 4 will be reviewed and updated, if required.

#### Response SVPS-26

Comment noted. Please see response SVPS-19. This well will utilize a properly designed sand pack to minimize future sanding problems.

#### Response SVPS-27

Kleinfelder revises their conclusions in the report, dated September 19, 2003 to state that the model-simulated impact from pumping 142 gallons per minute (gpm) for three years on flow rates in Squaw Creek is 1,000 gpd or approximately 5 gpm, averaged over an entire month. Kleinfelder's conclusions are based solely upon the memorandum from Derrik Williams to Mr. Rob Goldberg/PlumpJack, dated September 12, 2003. In that memorandum, Mr. Williams noted that "This may be an important change in stream flows during summer and autumn months, when the stream flows are the lowest".

The model-simulated impact of pumping 10 gpm to supply the needs of the PlumpJack expansion project will result in less impact to Squaw Creek flows than from pumping 142 gpm. Impacts to SVPSD #2 are minimal at a pumping rate of 10 gpm.

A more extensive analysis of the effects of increased pumping will be undertaken by the beneficiary of the additional pumping if the new well is used to supply water beyond the needs of the PlumpJack expansion project. This extensive analysis will address aquifer recharge and Squaw Creek impacts, will include direct monitoring of creek flows, and will be undertaken during the summer and fall months. During the extensive analysis, demand estimates for Intrawest Phase 3 and 4 will be reviewed and updated, if required.

#### Response SVPS-28

Kleinfelder revises their conclusions in the report, dated September 19, 2003 to state that the model-simulated impact from pumping the existing irrigation well may influence the flow direction of PlumpJack's estimated hydrocarbon plume. Again, Kleinfelder's conclusions are based solely upon the memorandum from Derrik Williams to Mr. Rob Goldberg/ PlumpJack, dated September 12, 2003. In that memorandum, Mr. Williams noted that his conclusions are tentative and based on incomplete data. He further noted that all known or suspected contaminant plumes should be rigorously monitored if the PlumpJack well is operated for water supply.

Mitigation measure WAT-1d will be added: "A groundwater monitoring system will be implemented using early warning monitoring wells. Observation well OW-1 and the existing irrigation well will be equipped as early warning monitoring wells and will be monitored quarterly in conjunction with other PlumpJack monitoring wells."

Response SVPS-29

Comment noted. Please see response SVPS -25.

Response SVPS-30

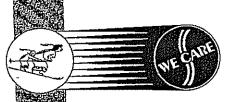
Comment noted. Please see response SVPS -28.

Response SVPS-31

Comment noted. Please see response SVPS -28.

Response SVPS-32

Comment noted. Please see response SVPS -27.



# **SQUAW VALLEY SKI CORP**

June 1, 2004

Mr. Michael Wells
Senior Planner
Placer County Planning Department
11414 "B" Avenue
Auburn
CA 95603

RE: PlumpJack Squaw Valley Inn Expansion Project

Dear Mr. Wells:

Please consider the following comments upon the proposed PlumpJack Squaw Valley Inn Expansion Project Draft Environmental Impact Report, delivered on behalf of Squaw Valley Ski Corporation.

I would like to initially note that Squaw Valley Ski Corporation did not receive notice regarding availability of the Draft EIR until April 29, 2004. We did not receive the DEIR pursuant to our request to County staff until May 5, 2004. We believe that the statutory requirements regarding notice to adjoining property owners were not satisfied. These delays have compromised our ability to adequately respond to the Draft EIR.

#### Comments:

P 4: The "Unavoidable Adverse Impacts" section states that "Project related impacts are anticipated for Squaw Valley Road/ Chamonix Place intersection. Cumulative plus project conditions will adversely impact the Squaw Valley Road/ SR-89 intersection. Likewise, Cumulative plus project impacts are anticipated for the SR-89 north of the Squaw Valley Road intersection."

SVSC-1

This summary on page 4 disagrees with section 4.3, "Unavoidable Adverse Impacts" commencing on page 154. Section 4.3 fails to identify Project Specific Impacts at the Squaw Valley Road/ Chamonix Place intersection, and also fails to identify Cumulative plus project impacts for "SR-89 north of the Squaw Valley Road intersection". Clarification is in order.

SVSC-2

P 11: Mitigation measure WQ-2j states "no washing... including cement mixers, shall be permitted anywhere in the subject property." It is necessary to washout cement mixers immediately after they deliver concrete. Thus, a designated on-

SVSC-3

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site concrete washout will be necessary.

P 13: Mitigation measure "g" indicates that during the ski season, truck traffic will be limited to after 10:00 a.m. and before 3:00 p.m. during weekend days or any holiday weekends that include either a Friday or a Monday. This is a helpful mitigation, but should be clarified to include the holidays that fall on Friday or Monday, and expanded to include the Christmas holiday period from December 22- January 6 in order to ensure safety and efficient traffic conduct.

SVSC-4

P 17: Item 3.12 identifies traffic "caused by a combination of high traffic demand exiting the Squaw Valley USA ski area..."; the reference should be changed to omit specific reference to the Squaw Valley USA ski area. Traffic originates from dozens of businesses in the Squaw Valley area, and it is not reasonable to attribute these general traffic patterns to one business entity.

SVSC-5

P 18: Item 3.12 identifies "peak entering or exiting time periods at the Squaw Valley Ski Area..."; the reference should be changed to omit specific reference to the Squaw Valley USA ski area for the reasons noted above.

SVSC-6

P 23: Section 2.1 identifies that "The proposed project is situated within the Squaw Valley Ski and Recreation Area"; the description appears inaccurate, unless reference is made to a designated area of which we are unaware. The proposed project lies *nearby* the Squaw Valley Ski and Recreation Area, though a better description is that the project is located at the western end of Squaw Valley.

SVSC-7

P 34: Impact LU-1 identifies that the Project will require a setback variance to allow location "10' from the front property line..."; the applicant should demonstrate that the proposed front setback variance will not interfere with snow removal conducted upon Squaw Peak Road by Placer County and by Squaw Valley Ski Corporation, or should propose mitigation in the form of indemnification to Placer County and to Squaw Valley Ski Corp for damage caused to the building by snow removal operation effects occurring within the ordinary 20' setback.

SVSC-8

P 35: Item "d" states that "The scope of this project is primarily on the property owned by PlumpJack with the exception of the improvements proposed to the bank of Squaw Creek." The applicant should identify the property owner of the land underlying the proposed improvements on the bank of Squaw Creek, and should make arrangement to conduct improvements upon that property in advance of offering such improvements as mitigation for the project.

P 37: The PUD Worksheet Calculations section states that "The total proposed parking supply for this project is 160 parking spaces. The proposed project and existing facilities require a total of 151 spaces according to the Squaw Valley General Plan."

SVSC-10

It appears that there is an existing parking deficiency at the PlumpJack facility; in addition to the existing hotel rooms, the existing PlumpJack conference center, restaurants, and retail space all create parking demands. Please refer to more detailed comments regarding parking in the discussion below, regarding Appendix H. Further explanation regarding the sufficiency of proposed parking is necessary.

P 53: Impact WQ-1 states that "Stormwater from paved parking areas will be collected in drainage inlets with pretreatment devices to remove oil and grease and course [sic] sediment." Squaw Valley Ski Corporation and the Village at Squaw Valley USA have received mandates from the Lahontan Regional Water Quality Control Board to install sophisticated treatment systems to remove fine sediment. If this level of treatment is necessary nearby, it would also appear to be necessary within the proposed PlumpJack project site.

SVSC-11

P 55: Mitigation measure WQ-2j identifies that "No washing of... cement mixers, shall be permitted anywhere in the subject property." It is necessary to washout cement mixers immediately after they deliver concrete. Thus, a designated on-site concrete washout will be necessary.

SVSC-12

P 59: The Fisheries section states "Squaw Creek provides spawning habitat for game fish residing in the Truckee River, including the federally threatened Lahontan cutthroat trout" (LCT). We are unaware of any evidence that Squaw Creek provides or could provide spawning habitat for LCT. In addition, it is widely-known that Squaw Creek is ephemeral, and that it completely dries up for several months each year. Therefore, its ability to act as a spawning habitat for LCT is highly unlikely if not impossible. In addition page 63 of the DEIR states that LCT "cannot tolerate presence of other salomids [sic]"; because Squaw Creek has been reported to support other salmonids, including brown trout, this would appear to be another factor making Squaw Creek an unsuitable habitat for LCT.

SVSC-13

P 60: The third paragraph states that "Squaw Creek is a perennial stream." Squaw Creek is an intermittent stream, and as discussed above, flows completely cease for a period of several months each year. This fact is well-documented. If Squaw Creek is considered a "perennial stream" because it flows every season, as opposed to continuously, further clarification is in order.

P 62: The first paragraph states "The nearest... occurrences of this plant [Donner Pass Buckwheat] are... to the south and east slopes of Silver Creek in the upper reaches of the Silver Creek and Squaw Creek drainages." The south and east slopes of Silver Creek appear to lie within the Silver Creek drainage, not the Squaw Creek drainage. The Squaw Creek drainage reference should be omitted or the statement should be clarified.

SVSC-15

P 65: The Special Status Fish section states that "Squaw Creek has the potential to provide habitat for the Lahontan cutthroat trout." Please see the discussion of LCT habitat above, relating to statements made on page 59 of the DEIR.

SVSC-16

P 67: The third paragraph states that "Given the magnitude of potential fill and siltation associated with the proposed project is expected [sic] to be minimal and not substantially effect functions and values within Squaw Creek, the impact is considered to be a "de minimus" contribution to the cumulative fill and sedimentation of waters of the United States in the Squaw Valley watershed, and particularly Squaw Creek. This potential impact is, therefore, considered to be a less than significant cumulative impact and no mitigation is required." Squaw Valley Ski Corporation has been advised on numerous occasions that it is the position of Placer County and of the Lahontan Regional Water Quality Control Board that, because Squaw Creek is "303D" listed, ANY addition of sediment and siltation is considered a significant impact. Because ANY addition of sediment to the system is considered significant, it appears that there is no room for "de minimus" impacts; revision of this section appears in order.

SVSC-17

P 70: The discussion regarding Impact BR-2 states "Some of the fish [LCT] have already been found in Squaw Creek having swam upstream from the Truckee River." The verifiable source for this information should be provided, together with the location of the sighting; we are unaware that LCT have ever been found in Squaw Creek.

SVSC-18

P 76: The background information regarding snowmaking contained in the last paragraph should be omitted. While interesting, the information is not entirely accurate and, because snowmaking is not proposed as part of the project under consideration, detailed discussion about its use on a nearby property does not belong in the DEIR.

SVSC-19

P 82: The section titled Effects Considered Not to Be Significant acknowledges that under the existing plus project condition, potential traffic increases on the order of 5% on Squaw Valley Road and SR-89 may occur. This would appear to

be a significant impact and one that merits some form of mitigation beyond payment of traffic impact fees, so that PlumpJack may share in the cost of providing service to its users of the roadway system.

P 83: In the second paragraph, the comparison of noise emanating from proposed landscape maintenance activities associated with the proposed project with existing noise from nearby snowmaking operations is not relevant or appropriate, and should therefore be excluded from the DEIR. Moreover, this comparison does not appear to be based on quantifiable information.

SVSC-21

In the third and fourth paragraphs, the DEIR purports to characterize noise from nearby resort operations related to arriving skiers, lift operation, snowmaking, and snow removal. The characterizations do not appear accurate and appear to be based upon unsubstantiated estimates. As a solution, the DEIR could identify that interior noise levels within the proposed project are anticipated to achieve levels that are 45 dBA L dn or lower, as a result of proper use of insulation and special windows, without attempting to precisely characterize (or more importantly, precisely attribute) outdoor ambient noise levels in the absence of sufficient data.

P 84: Mitigation measure N-2 item "g" states that during the ski season, truck traffic will be limited to after 10:00 a.m. and before 3:00 p.m. during weekend days or any holiday weekends that include either a Friday or a Monday. Again, this is a helpful mitigation, but should be clarified to include the holidays that fall on Friday or Monday, and expanded to include the Christmas holiday period from December 22- January 6 in order to ensure safety and efficient traffic conduct.

SVSC-22

P 109: The last paragraph erroneously states that "A majority of the project site contains... day skier parking for the Squaw Valley USA ski resort." Day skiers do not make use of parking at the project site unless they are PlumpJack hotel guests, and the PlumpJack parking area is conspicuously signed to prevent parking use by other day skiers.

SVSC-23

P 115: The fourth paragraph states that Squaw Valley is the "oldest ski operation in the Tahoe Basin." Squaw Valley is outside the Tahoe Basin.

SVSC-24

The fourth paragraph also states that "Squaw Valley... the oldest ski operation... was started in 1947 through the vision and perseverance of Wayne E. Poulsen." The Squaw Valley Ski Area was started as a result of partnership between Alex Cushing and Wayne Poulsen in 1949.

The fifth paragraph states that "Cushing was responsible for attracting the 1960 Winter Olympic Games to Squaw Valley." In fact, Cushing was also responsible for developing the ski area; the partnership between Cushing and Poulsen concluded prior to substantial development of the ski area.

P 119: The fourth paragraph states "The results of the forensic analysis of the soil and groundwater samples from the wells located on the Ski Corporation parking lot have conclusively determined that the contamination across Squaw Valley Road at the Village at Squaw Valley site was not caused by the PlumpJack underground storage tank site. It is also apparent that any soil or groundwater contamination that may have been present on the PlumpJack site is not migrating."

SVSC-25

Ski Corp respectfully but adamantly disagrees with these assertions, which are not grounded in fact. Please refer to the discussion of Appendix F, the August 2003 Report of Contaminant Migration Investigation Sampling and Testing" below, for further detail. No impartial body, including regulatory authorities, has agreed that the referenced tests have "conclusively" established the origins of contamination.

P 123: Discussion of the Squaw Valley Public Service District erroneously states that "The District has implemented a moratorium on all new development within their service area until new sources of water are identified or until a new treatment plant is constructed to treat water of poorer quality." The District has not implemented a moratorium of any kind.

SVSC-26

P 127: The last paragraph states "The results of the Study were used to... develop a watershed management plan." The watershed management plan was never finalized. Therefore, the text should refer to a *draft* management plan.

SVSC-27

P 131: The discussion of Squaw Peak Road states "Squaw Peak Road provides access from Squaw Valley Road to... areas located at the base of Squaw Valley USA." It would be more accurate to say that "Squaw Peak Road provides access from Squaw Valley Road to... areas located in the western portion of Squaw Valley"; very few of the areas accessible via Squaw Peak Road are located at the base of Squaw Valley USA.

SVSC-28

The same paragraph also states that "Squaw Valley USA parking lot is located on the eastern side of the Squaw Peak/ Squaw Valley Road intersection." The Village at Squaw Valley USA, not the parking lot, is located on the eastern side of the intersection today.

P 134: Footnote 2 states that "Results of this [Squaw Valley Road intersection] analysis differ from those presented in the Village at Squaw Valley USA Environmental Impact Report due to use of different intersection analysis software. This analysis employs a more detailed analysis technique, based upon revisions to the methodologies adopted subsequent to this previous traffic study." The full implications of the new methodology are not clear and the reasoning for its use remain unclear. If new analyses are justified, it does not appear appropriate to selectively apply new tools to findings contained in other reports. If new and better analytical tools are available, they should be employed in a new traffic study, and not to piecemeal alterations of an existing study.

SVSC-29

The second paragraph states that near the intersection with Squaw Peak Way, "Squaw Valley Road runs... with the Squaw Valley USA parking lot to the east." Again, the Village at Squaw Valley USA, not the parking lot, is located east of Squaw Valley Road in this vicinity.

This page omits a separate discussion of impacts expected to occur at the Squaw Valley Road/ Chamonix Place intersection; the introduction at page 4 states "Project related impacts are anticipated for Squaw Valley Road/ Chamonix Place intersection." Detailed discussion of these impacts at page 134 would be appropriate.

P 135: The Regulatory Framework section contains an overview of the Squaw Valley Ski Area Traffic Control and Parking Management program (the program).

Unless the PlumpJack project proposes to contribute to the cost of the program, the Squaw Valley Ski Area Traffic Control and Parking Management agreement with Placer County is not a relevant part of the regulatory framework relating to the proposed PlumpJack project.

SVSC-30

Regardless, the DEIR's paraphrased presentation of the program's provisions is inaccurate. Because it would be difficult to accurately paraphrase the content of the existing plan, it would be better to simply reference the plan by name (if necessary), but not to paraphrase it in the DEIR.

P 139: The section titled 2010 Conditions and Traffic Volumes identifies that "The portion of the existing ski parking east of the Squaw Valley Inn will be the site of the Village at Squaw Valley, with the parking relocated to a new parking structure to be built to the southeast of the Village. A one-way northbound traffic circulation circle will be constructed immediately east of the Squaw Valley Inn, with an entrance off of Squaw Valley road opposite existing Squaw Peak Road." Please consider that Phase I of the Village at Squaw Valley is complete; the area

east of the Inn now contains the Village, not the referenced parking lot. There is no Conditional Use Permit for the new parking structure to be built in the southeast corner of the Village; therefore, any analysis should not rely upon changes that may occur vis-à-vis the parking structure. The referenced circulation circle has also been completed.

P 140: The Impacts Considered Less Than Significant, cumulative plus project conditions section states "Even with the addition of the project-generated traffic, improvements over existing conditions [as a result of Village at Squaw Valley USA build out and mitigations] are expected at the study area intersections nearest the project site due to the shifting of traffic on Squaw Valley Road to Far East and Village East Roads (associated with the Village at Squaw Valley Development)." The rationale employed here appears to be that because the Village at Squaw Valley USA is expected to improve cumulative conditions over time, that these improvements will make cumulative impacts from the PlumpJack expansion negligible (i.e. continued development of the Village at Squaw Valley USA will mitigate traffic impacts from additional new development at PlumpJack). It does not seem appropriate to dismiss cumulative project-related impacts of the PlumpJack expansion based upon the improvements anticipated from implementation of another nearby project.

SVSC-32

The Parking analysis should also consider what appears to be a deficit in the current available parking at PlumpJack (see comment relating to page 37 above).

P 141: Table 3.12D identifies a condition for Intersection/ Approach "With metered Eastbound Right Turn"; no such condition exists. The eastbound right turn is not metered, and this potential condition should thus not be reflected in the table.

SVSC-33

P 143: The discussion of Impact TRANS-1 states that this [impact]... will still contribute to "peak period congestion and delay" and the "duration and number of occurrences of... traffic problems at the SR-89/ Squaw Valley Road intersection... This impact would occur approximately 40 hours per year on approximately 15 individual days... it is estimated that the queue length would be extended an additional 810 feet as a result..." The mitigation measures proposed to overcome these impacts do not appear adequate. Appropriate mitigation could include financial participation, beyond payment of traffic mitigation fees, in existing regional or local traffic management programs.

SVSC-34

P 144: The second to the last paragraph commences "During periods of peak exiting ski traffic..."; the reference to ski traffic should be omitted. The relevant

factor is that traffic is exiting, not its point of origin. Moreover, much traffic exiting from Squaw Valley during peak periods is not "ski" traffic.

The final paragraph identifies that "one possible mitigation measure for the southbound queuing on SR-89 during peak exiting ski area traffic would be to meter eastbound right turn movements from Squaw Valley..."; the DEIR does not propose to incorporate this potential change as mitigation for the impacts of the PlumpJack development. Therefore, discussion of this potential change is not relevant and should be omitted.

P 154: The discussion of Unavoidable Adverse Impacts identifies "exiting ski traffic" in the last three bullet points. The discussion should simply reference "exiting traffic."

SVSC-36

**P 158:** The discussion of noise alludes to "stationary-source noise sources from snowmaking and snow-related maintenance activities." The reference should be strictly to "stationary noise sources"; many such sources exist besides those related to snowmaking or snow-related maintenance.

SVSC-37

P 160: The noise analysis for the higher intensity alternative contains the same references described immediately above regarding page 158, which should be corrected in the same manner.

SVSC-38

# Comments on Appendix F "Groundwater Monitoring Report July 2002 PlumpJack Squaw Valley Inn and Ski Corporation Parking Lot"

SVSC-39

We would like to initially note that the referenced report was not provided to Squaw Valley Ski Corporation in July 2002 or at any other time previous to release of the DEIR for the PlumpJack expansion project, by either the project proponent or by the Lahontan Regional Water Quality Control Board to whom it was submitted. We have previously established, with both PlumpJack staff and with Regional Board staff that Ski Corp wishes to be copied on any correspondence relevant to the PlumpJack contamination plume which has impacted the ski area parking lot. In addition, we would like to note that we are aware of no authorization obtained by PlumpJack to conduct testing during 2002 upon property owned by Squaw Valley Development Company or its subsidiaries.

Significant analysis and comment upon the 2002 Groundwater Monitoring Report will not be possible by the June 1, 2004 deadline for submittal of comments upon the DEIR, but Ski Corp hereby provides the following preliminary comments:

### Introduction:

The introduction states that the report "presents the work product of three companies" including "Sausalito Financial Group, Inc" which also "prepared the introduction and background sections... and provided oversight of the report submittal." We would like to note that the presentation of work product by a financial company in the context of a scientific report on groundwater contamination is highly unusual, and does not lend credence to a scientifically independent report and analysis process.

#### Discussion:

The Discussion section of the report asserts that "it is apparent from the results that dissolved TPHd has decreased in concentration from the initial development and analysis of the wells."

In fact, the results do not demonstrate that dissolved TPHd has decreased over time. In MW99-01and MW99-02 (located on the PlumpJack property), TPHd contaminant concentrations have not decreased since July 1999. TPHd levels at wells MW 98-04 and 99-03 have also remained virtually unchanged, and exhibit no trend, since at least 1999.

SVSC-40

The argument presented that "The general absence of TPH in the wells on the PlumpJack property argues against a transport of diesel from that property to the Ski Corporation Parking Lot" is no more convincing today than it was in 1999, when it was not accepted by the Lahontan Regional Board staff, because conditions in the PlumpJack monitoring wells remain unchanged since 1999.

### **Groundwater Level Measurements:**

MW 98-03 and 98-06 were not "destroyed during construction activities associated with the expansion of the Squaw Valley Ski Resort."

SVSC-41

#### Conclusion:

We strongly disagree with the statements "the general absence of TPHd in the wells on the PlumpJack property continue to support the conclusion stated in previous reports that no migration had or was occurring form [sic] hydrocarbons on the PlumpJack property to the Ski Corporation property. It is likely that a source for diesel had existed at the western edge of the Ski Corporation parking lot, east of the Squaw Valley Road, at sometime in the past. That unidentified

source is the probable cause of the contamination of the soil and groundwater previously found in the vicinity of well MW 98-05."

Again, data collected from a single round of monitoring is not sufficient to draw the cited conclusions, and if one considers data collected over time, TPHd levels at wells MW 99-01 and 99-02 (located on PlumpJack property) and wells 98-04 and 99-03 have remained virtually unchanged, and exhibit no trend, since at least 1999.

### **Report Limitations:**

The report states "The information contained herein is only valid as of the date of the report." Because the report is nearly two years old, and because it addresses a dynamic phenomenon, the report does not appear valid for purposes of considering the PlumpJack expansion DEIR.

SVSC-43

# Comments on Appendix H "Traffic and Parking Impact Analysis" (the Analysis)

P 4: The discussion of Squaw Valley Road states that traffic cones are placed in the roadway during morning hours. Morning arrival traffic in Squaw Valley has recently been distributed over a longer time period, decreasing traffic density. Therefore, use of cones in the morning is no longer ordinarily necessary.

SVSC-44

The discussion of Squaw Peak Road should not reference the "base of the Squaw Valley Ski Area" but should instead reference the "western portion of Squaw Valley."

**P 6:** The first paragraph states that the Squaw Valley Ski Area parking lot is located east of the Squaw Peak/ Squaw Valley Road intersection. The Village at Squaw Valley USA, not the parking lot, is located east of the intersection.

SVSC-45

P 10: The discussion of the Squaw Valley Road/ Chamonix Place intersection states that "Results differ from those presented in the Village at Squaw Valley USA Environmental Impact Report due to use of different intersection analysis software." This information conflicts with the findings contained in the DEIR at page 134, which states that different results attributable to methodology affected analysis of the Squaw Valley Road/ H 89 intersection rather than the SV Road/ Chamonix intersection.

P 11: The Analysis attempts to characterize the Squaw Valley Ski Area Traffic Control and Parking management programs on page 11. Unless the PlumpJack project proposes to contribute to the cost of the program, details regarding the Squaw Valley Ski Area Traffic Control and Parking Management agreement with Placer County are not a relevant part of the regulatory framework relating to the proposed PlumpJack project.

SVSC-47

Regardless, the Analysis' paraphrased presentation of the program's provisions is inaccurate. Because it would be difficult to accurately paraphrase the content of the existing plan, it would be better to simply reference the plan by name (if necessary), but not to paraphrase it in the Analysis or in the DEIR.

**P 15:** The "Traffic Distribution and Assignment" section references the Village at Squaw Valley Environmental Impact Report regarding traffic distribution on Northbound (61% of traffic) and Southbound (37%) Highway 89.

SVSC-48

These cited traffic distributions disagree with the "Historical Traffic Volumes" cited on page 6 of the Analysis, which identify that 1999 peak hour volumes were roughly balanced between north and southbound, that 2000 southbound peak hour traffic volumes exceeded northbound traffic volumes, and that average daily traffic volume during the peak month in 2000 was greater on H89 southbound than on H89 northbound.

In sum, the distribution cited at page 15 of the Analysis suggests that significantly more traffic exits Squaw Valley Road northbound on Highway 89 than exits southbound; the findings on page 6 of the Analysis suggest that more traffic exits Squaw Valley Road southbound on Highway 89 than northbound. Clarification is in order.

P 17: The discussion of Forecasted 2010 Traffic Volumes should be generally corrected to reflect that:

- a.) The ski parking lot east of PlumpJack no longer exists and has been replaced by the Village at Squaw Valley USA.
- b.) The circulation circle has been completed in front of the Village at Squaw Valley USA.
- c.) Formerly existing displaced parking was replaced through underground parking beneath the Village and creation of a preferred parking structure. This parking was not anticipated to be replaced with "a new parking structure to be built to the southeast of the Village."
- d.) Squaw Valley Road currently terminates at the existing Squaw Peak Road intersection.

P 19: The first paragraph states "It was further assumed that the project access driveway intersection with Squaw Peak Road and the remaining turn movements at the Squaw Peak Road/ Squaw Valley Road intersections would maintain peak hour traffic volumes similar to existing conditions... under existing conditions... peak flows saturate all of the available capacity of the circulation aisles in the parking lot, which effectively limits the peak volumes that can be delivered to these two intersections to be similar to existing volumes."

SVSC-50

The Analysis seems to suggest that because traffic already affects the referenced intersections during peak hours, contributions from the proposed PlumpJack expansion are not relevant. This explanation is not clear in the context of peak hour traffic volume contributions that are anticipated as a result of the proposed PlumpJack expansion. The explanation should be clarified.

P 22: Table 7 contains three unsupported premises which should be supported:

SVSC-51

- a.) The "Existing Parking Supply" is identified at 71 spaces. Because the existing hotel has 61 rooms, only 10 spaces are thus available, under existing operations, to support a large conference center, retail and ski shops, a restaurant and bar, and staff for hotel housekeeping, maintenance, desk, reservations, management, grounds keeping, and food and beverage. The parking demands for the existing restaurant, ski shop, and "multi-purpose room" (i.e. large two-story conference center), are figured according to a 50% reduction in required parking because these facilitates are ostensibly "hotel uses." The restaurant, ski shop, and conference center all operate as separate business entities serving guests who are not staying at the PlumpJack hotel. Therefore, these uses exert more parking demand than "hotel operations" and should not be considered as such. The existing parking supply is not adequate and cannot be taken as the starting point from which to analyze additional parking demand to be created by the proposed expansion project.
- b.) "Note 2" identifies "Incremental increase of 0.25 parking spaces per lock-out unit due to the increase in parking requirements." Because lock-out units would function as hotel rooms, one full space should be necessary for each of the lock-out units, not 0.25 spaces.
- P 26: Table 8 identifies a condition for Intersection/ Approach "With metered Eastbound Right Turn"; no such condition exists. The eastbound right turn is not metered, and this potential condition should thus not be reflected in the table.

Thank you for considering these comments delivered on behalf of Squaw Valley Ski Corporation.

Sincerely,

Mike Livak

### RESPONSE COMMENTS

### **Squaw Valley Ski Corps**

### Response SVSC-1

Project-related impacts at the Squaw Valley Road/Chamonix Place intersection are considered to be less than significant. Therefore, the statement that "Project-related impacts are anticipated for Squaw Valley Road/Chamonix Place intersection" will be deleted from the Unavoidable Adverse Impacts section on page 4. In addition, Section 4.3 on page 154 will be revised to be consistent with page 4.

### Response SVSC-2

See response SVSC-1.

### Response SVSC-3

Comment noted. Mitigation Measure WQ-2j has been revised from, "No washing of vehicles or construction equipment, including cement mixers, shall be permitted anywhere in the subject property" to "Washing of vehicles or construction equipment, including cement mixers, shall be permitted only in areas where a temporary washout station is provided."

### Response SVSC-4

Comment noted. It is not necessary to clarify Monday and Friday holidays specifically, since that is the intent of the measure. However, the language has been changed to include National Holidays only. The measures reads as follows:

g) During the ski season, construction-related truck traffic shall be limited to after 10:00 a.m. and before 3:00 p.m. during weekend days or any holiday weekends that includes either a Friday or a Monday, and during the seasonal period between December 22 and January 6. Truck traffic shall not be allowed between the hours of 7:00 a.m. to 10:00 a.m. and between 3:00 p.m. and 5:30 p.m.

### Response SVSC-5

Comment noted. The language was changed from "caused by a combination of high traffic demand exiting the Squaw Valley USA ski area" to "caused by a combination of high traffic demand from vehicles exiting the Squaw Valley area".

### Response SVSC-6

Comment noted. The language was changed from "peak entering or exiting time periods at the Squaw Valley Ski Area" to "peak entering and exiting time periods in the Squaw Valley area".

### Response SVSC-7

Comment noted. The language was changed from "The proposed project is situated within the Squaw Valley Ski and Recreation Area" to "The proposed project is situated adjacent to the Squaw Valley Ski and Recreation Area at the end of Squaw Valley".

Comment noted. The proposed project requires a 10-foot variance for standard property setback. The issue of snow removal interference, as a function of impact significance studies, will be considered by the County decision-makers before any variance is granted.

### Response SVSC-9

Comment noted. The portion of Squaw Creek proposed for rehabilitation is located on Assessor's Parcel Number 096-020-021. This parcel is owned by Squaw Valley preserve, Inc and the property owner has not been contacted yet about this rehabilitation. Providing restoration services would appear to be a positive situation, benefiting both Squaw Creek and the property owner. No text change is required.

### Response SVSC-10

The Planned Development Calculations are reflected in the Traffic & Parking study prepared by LSC Transportation Consultants, Inc. Please refer to Appendix H, Table 7, of the DEIR. Parking requirements are defined for each use, as required by the 1983 Squaw Valley General Plan. Uses identified for the existing condition include 61 hotel rooms, office space, restaurant, ski shop and multi-purpose room. The proposed condition reflects the additional units by the number of bedrooms. Parking calculations show 151 parking spaces are required. The proposed number of parking spaces is 160 spaces, a surplus of 9 spaces. No text change is required.

### Response SVSC-11

The discussion of Impact WQ-1 language has been changed from, "Stormwater from paved parking areas will be collected in drainage inlets with pretreatment devices to remove oil & grease and course sediment" to "Stormwater from parking areas is proposed to be treated in either a 2-stage treatment system (consisting of pretreatment devices for oil, grease, and coarse sediment followed by treatment in a stormwater detention) or by a Stormfilter (or equal) stormwater treatment vaults. Stormfilter vaults are sophisticated stormwater treatment devices that use various filter media to remove pollutants from stormwater (including fine sediment)."

#### Response SVSC-12

Comment noted. Please see response SVSC-3.

### Response SVSC-13

Comment noted. Further clarifications have been obtained from the US Fish and Wildlife Service regarding the Lahontan cutthroat trout (LCT). This issue was discussed with the USFWS Reno Office (Ann Bowers, Fish and Wildlife Biologist), lead agency for recovery of the LCT. They indicated that there are no populations of LCT in Squaw Creek, and there are no short-term recovery activities planned for this area. Therefore, no limited operating period (construction) would be required for this project.

Reference the Squaw Creek as a perennial stream has been changed to intermittent stream.

Response SVSC-14

Comment noted. See SVSC-13.

Comment noted. The sentence is amended to read: "The nearest two recorded occurrences of this plant are along the bank of Squaw Creek, near the junction of Squaw Creek and Highway 89, and to the south and east slopes of Silver Creek in the upper reaches of the Silver Creek drainage."

#### Response SVSC-16

Comment noted. See response SVSC-13.

### Response SVSC-17

Comment noted. No work will be allowed in the live stream, therefore, it is not expected that any sediments will be discharged into the creek. Consequently, there will be a less than significant cumulative impact on the creek. (Also refer to Mitigation measure BR-1).

#### Response SVSC-18

Comment noted. See response SVSC-13.

### Response SVSC-19

Comment noted. While the actual processes of snowmaking is not necessary for this project, it is important to note that noise from snowmaking activities should be addressed in the existing/background noise conditions. Retention of the snowmaking reference is fundamental to the understanding of noise conditions in the document.

### Response SVSC-20

The project is estimated to result in a potential increase in two-way traffic volumes along Squaw Valley Road of about two percent near SR 89, and five percent near Chamonix Place. Similarly, the potential increase in traffic volumes along SR 89 is expected to be approximately one percent at a point immediately north of Squaw Valley Road, and less than one percent to the south of Squaw Valley Road. The significance of the potential impacts associated with these increases in traffic are assessed with respect to the specific impacts on intersection and roadway LOS, as presented in Section 3.12.3 Project Impacts and Mitigations.

Regarding mitigation beyond payment of traffic impact fees, as discussed above, the project applicant should contribute its fair-share to two projects in Truckee. In addition, the proposed project will generate an increase in Transient Occupancy Taxes (TOT), which currently fund the North Lake Tahoe Resort Association (NLTRA) traffic management program. (This program includes winter traffic control in Tahoe City, summer traffic control at Fanny Bridge, etc.)

#### Response SVSC-21

Comment noted. However, the comparison of project-generated noise to current ambient noise conditions is relevant to the DEIR study and will not be omitted. The qualitative comparison is relevant to periodic noise events in the project vicinity.

The third and fourth paragraphs mentioned in this comment provide a qualitative assessment of the typical noise effects expected at the site. As noted in Measure N-1, typical building materials and techniques will provide attenuation from these potential noise events. No text change is required.

Response SVSC-22

Comment noted. See response SVSC-4.

#### Response SVSC-23

Comment noted. Mention of the parking lot containing day-use parking for Squaw Valley USA ski resort has been removed.

### Response SVSC-24

Comment noted and the text has been changed.

### Response SVSC-25

Comment noted. The language in this section has been changed from, "The results of the forensic analysis of the soil and groundwater samples from the wells located on the Ski Corporation parking lot have conclusively determined that the contamination across Squaw Valley Road at the Village at Squaw Valley site was not caused by the PlumpJack underground storage tank site" to "The detailed analysis performed by ZymaX presents irrefutable evidence that the diesel contamination found in the groundwater samples from wells MW98-01, MW98-02, and MW 98-05 are unrelated to the diesel and heavy oil contamination found in the soil samples from well MW99-01 located on the PJSVI Property. Further, since MW99-01 is located between the point of release for the event that occurred on the PJSCI Property and the contamination found in the vicinity of MW98-05 in the Ski Corporation Parking Lot, the lack of any connection between the two diesel contaminants is further evidence that the contamination in the Ski Corporation Parking Lot is not the result of any event which occurred on the PJSVI Property. The diesel contaminants analyzed in soil samples from MW99-01 indicate that this diesel is much more highly weathered than diesel contaminants found much further down gradient in the vicinity of well MW98-05. This is exactly the opposite of what would be expected if in fact these two diesel contaminants were from the same source. It also appears that the groundwater contamination is not migrating and that the contaminants are degrading by natural attenuation." This information is provided in the PlumpJack October 8, 1999 Report of Contaminant Migration Section 8.0. It is available for review at the Placer County Planning Department.

#### Response SVSC-26

Comment noted. The language has been changed from "The District has implemented a moratorium on all new development within their service area until new sources of water are identified or until a new treatment plant is constructed to treat water of poorer quality" to "The Squaw Valley Public Service District commissioned a study entitled the "Squaw Valley Groundwater Development & Utilization Feasibility Study" to review water sources to meet the demand of Squaw Valley at buildout. At this time, any permit or assurance of water service is issued on a first-come, first-served basis. However, the District has stated that it does not have adequate water supply to issue permits. In some cases, the District may provide service via a negotiated agreement to develop new sources."

Comment noted. Watershed Management Plan changed to Draft Watershed Management Plan.

#### Response SVSC-28

Comment noted. Changed from "areas located at the base of Squaw Valley USA" to "areas located in the western portion of Squaw Valley".

Comment noted. Changed from "Squaw Valley USA parking lot" to "the Village at Squaw Valley USA".

### Response SVSC-29

According to the Village at Squaw Valley EIR, the SR 89/Squaw Valley Road intersection operates at LOS B, not LOS A. Footnote 2 on page 134 of the PlumpJack DEIR will be revised accordingly. The results of the PlumpJack traffic study indicate the SR 89/Squaw Valley Road intersection operates at LOS C, based on updated Highway Capacity Manual (HCM) methodologies. In response to the comment about "piecemeal alterations of an existing study", the PlumpJack study is not based on an alteration of the existing (Village) study. Rather, the SR 89/Squaw Valley Road turning-movement volumes were pulled from the existing (Village) study for use in the PlumpJack LOS analysis.

For the purposes of this analysis, existing conditions do not include the Village at Squaw Valley USA (the Village). The Village is evaluated as a future condition, which was correct at the time the notice of preparation was filed for the PlumpJack project.

Page 134 discusses existing conditions without the project. A discussion of the existing LOS at the Squaw Valley Road/Chamonix Place intersection will be added to this page. However, project impacts on this intersection are discussed in Section 3.12.3 on page 137. Project-related impacts at the Squaw Valley Road / Chamonix Place intersection are considered to be less than significant. Therefore, the statement that "Project-related impacts are anticipated for Squaw Valley Road / Chamonix Place intersection" will be deleted from the Unavoidable Adverse Impacts section on page 4.

### Response SVSC-30

The description of the program will be deleted from the Regulatory Framework section. However, it is important to mention the metering of traffic at the SR 89/Squaw Valley Road intersection, as it directly affects the results of the LOS analysis. According to the <u>Squaw Valley Traffic Management Agreement</u> (Placer County and Squaw Valley Ski Corp, 1998), a traffic metering control station will be operated at the intersection of Squaw Valley Road and Highway 89. Therefore, metering of the eastbound right-turn lane will be included in the traffic study. The description of the SR 89/Squaw Valley Road intersection on page 133 will state that "Manual control of the SR 89/Squaw Valley Road intersection is typically provided on weekends and is usually limited to the afternoon peak period when skiers are leaving the ski area."

For the purposes of this analysis, existing conditions do not include the Village at Squaw Valley USA. The Village is evaluated as a future condition, which was correct at the time the notice of preparation was filed for the PlumpJack project. However, on page 139, the phrase "...with the parking relocated to a new parking structure to be built to the southeast of the Village" will be deleted.

### Response SVSC-32

As shown in Table 8, under cumulative 2010 plus project conditions, the LOS at the Squaw Valley Road/Squaw Peak Road intersection is good, and the Squaw Valley Road/Chamonix Place intersection LOS meets the applicable standards. Now that the Village is in place, it is evident that there is no potential for those intersections to fail, even with the addition of the proposed PlumpJack project.

The existing PlumpJack uses are included in the parking demand calculations for the proposed project. The parking requirements are based on the 1983 Squaw Valley General Plan. Typically, a Traffic and Parking Impact Analysis for a proposed development does not evaluate the existing parking balance.

### Response SVSC-33

According to the <u>Squaw Valley Traffic Management Agreement</u> (Placer County and Squaw Valley Ski Corp, 1998), a traffic metering control station will be operated at the intersection of Squaw Valley Road and Highway 89. County staff recently confirmed this agreement is valid. Therefore, metering of the eastbound right-turn lane is pertinent to the traffic study. The description of the SR 89/Squaw Valley Road intersection on page 133 will state that "Manual control of the SR 89/Squaw Valley Road intersection is typically provided on weekends and is usually limited to the afternoon peak period when skiers are leaving the ski area."

#### Response SVSC-34

As discussed above, the revised traffic study will identify the project's fair-share contribution to two projects in the Town of Truckee. As a regional traffic management program does not exist, there is no way to define what dollar amount should be contributed to such a program. However, the proposed project will generate an increase in Transient Occupancy Taxes (TOT), which currently fund the North Lake Tahoe Resort Association (NLTRA) traffic management program. (This program includes winter traffic control in Tahoe City, summer traffic control at Fanny Bridge, etc.)

### Response SVSC-35

As requested, the reference to "ski" traffic will be omitted. Although metering the eastbound right-turn movement from Squaw Valley Road would not fix the LOS problem on SR 89, it is relevant to this analysis because it is required by the <u>Squaw Valley Traffic Management Agreement</u> (Placer County and Squaw Valley Ski Corp, 1998).

### Response SVSC-36

Comment noted. "Exiting ski-traffic" changed to "exiting traffic".

Comment noted. However, snow-related maintenance activities create a significant noise impact compared to other existing noise sources. Reference to snow-related maintenance activities was intended to qualitatively compare the potential noise effects relative to interior noise conditions between the Lower Intensity Alternative with the proposed project. Fewer project residents would be exposed to noise generated by snow maintenance activities for the Lower Intensity Alternative than for the proposed project (due to additional residential uses/residents).

### Response SVSC-38

Comment noted. See response SVSC-37 regarding noise exposure for fewer residents.

### Response SVSC-39

Comment noted. The County adhered to the legal notification requirements required for public review of the Draft EIR document.

Scientific information provided in this report was prepared by registered geologist Kevin Brown and laboratory testing performed by Zymax in accordance with EPA testing methodology. Preparation of additional information by a financial company does not modify any scientific findings.

#### Response SVSC-40

Comment noted. Please refer to Table 1 of Appendix F, the "Groundwater Monitoring Report July 2002 PlumpJack Squaw Valley Inn and Ski Corporation Parking Lot". The two monitoring wells on the PlumpJack property are numbered MW-99-01 and MW-99-02. These wells were sampled from 1999 to 2004. Monitoring information for MW-99-01 indicates that TPHd levels were non-detectable except in 2000 when the level was 160 micrograms per liter and on August 6, 2003 when the level was 120 micrograms per liter. For MW-99-02 TPHd levels were non-detectable at every testing date. Please note that this monitoring well was inaccessible during one testing event and dry at two others. TPHd levels remain virtually undetectable in these two wells, with the exception of two testing events. However, the TPHd found in the PlumpJack wells is consistent with motor oil, while the TPHd in the Ski Corporation Parking Lot is associated with diesel fuel The PlumpJack October 8, 1999 Report of Contaminant Migration details the testing and analysis of soil and water samples in sections 7.4.5 and 7.4.6. These analyses were performd by Dr Issac Kaplan of Zymax Forensics. The analysis concluded that the hydrocarbons in the soil samples from MW-99-01-10.0 was a motor oil (7.4.6 (a)) and that the hydrocarbons in the soil sample from MW-99-01-15.0 was a highly degraded Bunker C heating oil or Motor Oil (7.4.6 (b)).

### Response SVSC-41

Comment noted. According to Placer County, wells 98-03 and 98-06 were destroyed in June of 2000. Additional detail regarding this destruction is not available at this time. Placer County Environmental Health does not have copies of a permit for the destruction of these wells. The proper destruction methodology will be ascertained by Placer County Environmental Health Services at the time the remediation is closed by their office and the Lahontan Regional Water Quality Control Board and the remaining wells are destroyed.

Comment noted, Please refer to response SVSC 40. Please note that data was collected from monitoring wells from 1999-2002.

#### Response SVSC-43

The report was current at the time the notice of preparation was filed as consistent with CEQA requirements. PlumpJack Squaw Valley Inn provides regular monitoring reports to the Lahontan Regional Water Quality Control Board. This agency is responsible for addressing any contamination.

### Response SVSC-44

Page 4 will be revised accordingly. (The "morning and evening" phrase will be deleted.) Page 131 of the DEIR and Page 4 of Appendix H will be revised accordingly.

#### Response SVSC-45

For the purposes of this analysis, existing conditions do not include the Village at Squaw Valley USA. The Village is evaluated as a future condition, which was correct at the time the notice of preparation was filed for the PlumpJack project.

#### Response SVSC-46

The PlumpJack LOS analysis is based on updated Highway Capacity Manual (HCM) methodologies, which include updated software. The LOS results at both intersections differ from those presented in the Village at Squaw Valley USA EIR. The description of the Squaw Valley Road/Chamonix Place intersection will be added on Page 134, and it will be made clear that Footnote 2 applies to both intersections.

#### Response SVSC-47

The description of the program will be deleted from page 11. However, it is important to mention the metering of traffic at the SR 89/Squaw Valley Road intersection, as it directly affects the results of the LOS analysis. According to the Squaw Valley Traffic Management Agreement (Placer County and Squaw Valley Ski Corp, 1998), a traffic metering control station will be operated at the intersection of Squaw Valley Road and Highway 89. County staff recently confirmed this agreement is valid. Therefore, metering of the eastbound right-turn lane is pertinent to the traffic study. The description of the SR 89/Squaw Valley Road intersection on page 9 of Appendix H will state that "Manual control of the SR 89/Squaw Valley Road intersection is typically provided on weekends and is usually limited to the afternoon peak period when skiers are leaving the ski area."

#### Response SVSC-48

The distribution of project-generated trips is not based on the traffic volumes on SR 89. Rather, it's consistent with the Village at Squaw Valley USA EIR distribution, which is based on existing traffic counts, guest origin information from the Resort at Squaw Creek, skier survey results collected as part of the State Route 89 Transitway Feasibility Study (1996), intercept survey results contained in the North Lake Tahoe Tourism Development Master Plan (1995), and personal interviews with Squaw Valley Ski Corporation, Intrawest, and North Lake Tahoe Resort Association staff regarding the

expected demographics of Village employees and visitors. This explanation will be added on page 15 of Appendix H.

### Response SVSC-49

For the purposes of this analysis, existing conditions do not include improvements associated with the Village at Squaw Valley USA. The Village is evaluated as a future condition, which was correct at the time the notice of preparation was filed for the PlumpJack project. However, on page 139, the phrase "...with the parking relocated to a new parking structure to be built to the southeast of the Village" will be deleted.

### Response SVSC-50

As explained on page 18, the Village at Squaw Valley EIR does not present 2010 traffic volume estimates for the Squaw Valley Road/Squaw Peak Road intersection. The paragraph quoted above explains how the 2010 traffic volumes at this intersection are estimated. Please reference Figure 4 on page 16 of Appendix H for the project-generated peak-hour traffic volumes. As shown, the project is expected to add 27 eastbound left turns and 11 southbound right turns to the Squaw Peak Road/Squaw Valley Road intersection. As indicated in Table 8 on page 26, the project would not impact the LOS at this intersection. However, it would increase the delay on the eastbound approach by up to 0.9 second.

### Response SVSC-51

The 50% reduction for uses associated with the hotel is allowed by the Placer County Code. Whether the restaurant and ski shop are owned by the same company or by separate entities would not affect their use. That is, the restaurant and ski shop would act as auxiliary uses to the hotel, even if they are owned by individual entities. Therefore, the 50% reduction is appropriate for these land uses. Under typical conditions, no parking problems are expected to be associated with the multi-purpose room. Furthermore, if the multi-purpose room is used for a maximum- attendance public (non-hotel guests) event during a time when the hotel is fully occupied, the parking demand would increase by approximately nine spaces. The resulting parking balance would be zero, indicating no parking shortfall. This explanation will be added to the traffic study text.

The existing parking balance is typically not evaluated in a Traffic and Parking Impact Analysis for a proposed development. The existing PlumpJack land uses are included in the parking demand calculations for the proposed project. The existing parking spaces are included in the total proposed parking supply (the existing parking spaces are not used as a starting point). The parking requirements are based on the 1983 Squaw Valley General Plan.

As shown in Table 7, 0.75 space is required for each proposed bedroom. In addition, 0.25 space is required for each lock-out unit. The total parking requirement per lock-out unit is therefore one space (0.75 plus 0.25), assuming each lock-out unit contains one bedroom. This explanation will be included in the revised traffic study text.

#### Response SVSC-52

According to the Squaw Valley Traffic Management Agreement (Placer County and Squaw Valley Ski Corp, 1998), a traffic metering control station will be operated at the intersection of Squaw Valley Road and Highway 89. County staff recently confirmed this agreement is valid. Therefore, metering

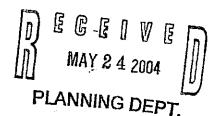
of the eastbound right-turn lane is pertinent to the traffic study. The description of the SR 89/Squaw Valley Road intersection on page 9 of Appendix H will state that "Manual control of the SR 89/Squaw Valley Road intersection is typically provided on weekends and is usually limited to the afternoon peak period when skiers are leaving the ski area."

## H. SPENCER BLOCH, M.D.

706 D Street, San Rafael, California 94901-3757

May 15, 2004

Mr. Michael Wells, Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603



Telephone: (415) 456-1373

re: Draft EIR for Plumpjack Squaw Valley Inn expansion project

Dear Mr. Wells:

I appreciate the opportunity to respond to the above-captioned document, and will address specific items as well as offering an overall view of this proposed project.

Implicit in the EIR concept (p. 20) [Page references are to the EIR document.] seems to be an eminently reasonable idea that a proposed development should not be evaluated in isolation. Rather, it needs to be considered in the context of the environment in which it is to fit. Thus, for example, the fact that an earlier developer was granted approval for a project does not of itself justify a later developer being permitted to do something similar. That is because the neighborhood was changed for evermore by the first development, and that altered environment now forms the basis for consideration of subsequent proposals.

HSB-1

### THE OVERALL PROJECT

1) "A six-story building will have an adverse effect on short-term views from adjacent residential vantages. Mitigation measures are not available." (p. 2):

COMMENT: That understatement basically reflects the absolute disregard the developer has shown for the existing neighborhood in designing his project. This unmitigated, severe impact on the immediate, long-time neighbors should by itself disqualify it.

HSB-2

My assertion that the project was designed with absolutely no consideration of the immediate neighborhood is further evidenced in such features, among others, as the developer's intention:

- a) to move it closer to Squaw Peak Road (discussed below),
- b) to afford no buffer (as stipulated (p. 101) in the County General Plan) between its towering mass and the neighboring Tram Condos (where large trees now exist), and
- c) to place their garbage dumpster and a loading dock in our faces at the west end of the project (p. 148).
- 2) "Project improvements will introduce development into an area that is already developed with similar architecture and building intensity." (p. 2)

HSB-3

COMMENT: That statement is misleading in several respects:

a) Impact LU-2 (p. 35): The proposed height of the development is justified by comparing it to that of the Tram Building and the Intrawest project.

HSB-4

COMMENT: These are specious comparisons. For the Tram building is a unique structure in the Valley--required for skiing not living. And the Intrawest property is on the other (east) side of Squaw Valley Road which forms a natural divide between the extremely out-sized commercial/residential and the more reasonably-sized residential structures. Moreover, the Intrawest project itself conforms to only one-half of the goal of the SV General Plan (p. 31). For while it does "provide additional tourist accommodation units and amenities" (p. 31), it hardly "maintains the alpine atmosphere" (p. 31) of any authentic alpine village of which I am aware. By comparison, everything to the northwest of the Inn is scaled to its current size. Specifically:

- i) NO BUILDING to the west of the corner of Squaw Peak Road and Squaw Valley Road is more than 3 stories tall.
- ii) Even more important, NO BUILDING on the north side of Squaw Peak Road, including the Inn's immediately adjacent neighbors is more than 2 stories. The EIR errs in stating otherwise (p. 111). It seems amply reasonable and justified to keep the north side of Squaw Peak Road confined to smaller residential structures as a way of maintaining some protection from massive high rise development. Otherwise, as the EIR implies, we will lose too much.

HSB-5

1) Compare these two descriptions of the site: "This area has already been disturbed and contains very little vegetation or undisturbed natural areas." (p. 23)

HSB-6

"Vegetation consists of grassed areas and numerous large pine trees up to 32 inches in diameter." (p. 38)

COMMENT: While these two statements are not necessarily antithetical, each conveys a very different sense about the site. I strongly suspect that if the Planners and Planning Commissioners visit it, they will be left with the impression that the area contains significant vegetation.

2) The EIR is misleading in noting that the proposed development will only increase the covered area from a current 58.5% to 67.7% (p. 52) or 50.8% to 64.6% (p. 56), depending on where you are reading.

HSB-7

COMMENT: While perhaps technically accurate within the range described above, those figures obfuscate the major point. That is, the current coverage is a landscaped area which looks more like a park than a parking lot. It serves as an attractive separation of the commercial area to the east and the residential areas to the west. The proposed lot coverage is as similar to the current coverage as chalk is to cheese.

Moreover, what special circumstances exist that justify granting a use permit to build more condos in an area which is already overstocked with condos? Before approving high rise condos at this particular location, it seems incumbent upon the Planning Commission to determine that sufficient housing has not yet been built nor will be in already phased-in developments.

3) A variance for the 20-foot setback from the street (Squaw Peak Road) to 10 feet is being requested (p. 34-35).

HSB-8

COMMENT: This is being done to squeeze every bit of development onto the site (p.35 a). The developer realizes that the Creek bank on the north border of his property is very fragile and just waiting to crumble under the impact of major construction (p. 35, p. 40). Does that constitute a "special circumstance" to merit granting the variance? I don't think so, especially since doing so will create even greater danger to pedestrians on the front/street side of their site. The already increasing, existing traffic makes walking along Squaw

Peak Road dangerous when it is slippery. The sidewalk along part of Squaw Peak Road is not shoveled, and in any event, does not extend along the Inn property. I disagree with the EIR's contention that the Variance will not "affect public health and safety and is not materially detrimental to the public welfare, nor injurious to nearby property or improvements" (p. 35 d).

A variance certainly cannot be justified by the observation that such have been granted for earlier developments (which is the way the EIR passes it off). As I noted at the outset, that hardly gives the newcomer a right to expect the same. Proposition 13 put those kinds of expectations to rest. If an area has become saturated by prior development so that traffic and people cannot move at peak times (p. 17, notation 3.12), and so that the ambiance is being destroyed, then a new developer who wants to supersaturate the area has no right to expect carte blanche. And that is what is being requested.

4) The additional 89 parking spaces to be built will be "more than adequate to meet parking requirements in the SV General Plan" (p 140).

HSB-9

COMMENT: Again, I have to presume the accuracy of the EIR's figures, but do they tell the true story? For 28 "lock-out units" are being proposed as part of the 34, two and three bedroom units. If I understand what "lock-out units" are, this makes a potential total of 62 units which can be occupied at the same time. I would think that parking requirements must consider maximum occupancy, so what is proposed would hardly be sufficient. That is because all units have 2 or 3 bedrooms, and thus would most likely be occupied by people arriving in more than one car or SUV or tank or Humvee.

### TRAFFIC and PEDESTRIAN CONGESTION

1) The EIR clearly indicates that this project will significantly add to congestion in the immediate area and in the environs (p. 140-143). Even "(i)mplementation of above measures [suggestions for mitigation] will aggravate conditions for cumulative 2010 project conditions. Therefore, the project will have a significant and unavoidable impact for traffic." (p. 143)

HSB-10

COMMENT: In the past couple of years it has become at times almost impossible to get into the Valley because of traffic congestion. And

Squaw Valley cannot be a law unto itself; there are other resorts at Tahoe. So, it would seem that before gridlock (which is already occurring on Rte 89) becomes an every weekend reality, the planners should be disallowing unnecessary development in an effort to reduce this problem. This proposed project does not fulfill any need in the Valley. Furthermore, suggestions for mitigating traffic/congestion such as timing entry and exit of people staying at the Inn (p. 143) are clearly not feasible. People come and go at will.

### RESOURCES

1) The EIR identifies insufficient water supply in the Valley to support future development (p. 3).

HSB-11

COMMENT: The Inn proposes to dig its own well for potable water. Unless I'm missing something, it would seem that the water table from which their well would draw is the same one used by everyone else in the Valley. So, how does that solve rather than aggravate the water problem? Also, what is the significance of the Kleinfelder study which reports having encountered groundwater on their more recent exploration at 23 feet below existing grade, while on a prior survey they had found it at 14 feet below grade with indications of past levels at 11 feet (p. 39; p.9 of appended Kleinfelder report)? Can this be explained away by seasonal variation, or could the water table be dropping and this project will just exacerbate the problem?

2) Potential damage to 100-year floodplain and creek bank which was eroded during the 1997 flood (p. 50).

HSB-12

COMMENT: The 1997 flood just reached the first floor level of a couple of Tram Condo units. But, had the massive wall of the proposed project at the east side of our lot existed then, we would almost certainly have been inundated, even with the escape lane between our properties. So, this is notice that the future safety of adjacent homeowners must be taken into consideration.

3) Significant risk exists that this project will put fill into Squaw Creek (p. 11, notation 3.4)

HSB-13

COMMENT: One walk along the creek side of the Inn property will convince anyone that the quality of the soils there will cause this to happen despite the recommended mitigation measures. This holds

true even if they push the project to the street side of their site to mitigate it. What is the justification for allowing any fill into the creek and any destabilization of the creek bank?

### CONCLUDING COMMENTS:

If developers had a God-given right to do whatever they want with their property, there would be no need for Planning Departments and Planning Commissions. Thus, this is a political process with every reason to presume that the interests of existing property owners should be recognized, considered, and protected. This project is just too massive by orders of magnitude, and inappropriate for the side of the street on which the Inn is located. It is unnecessary to accomplish the long-time goal of Placer County supervisors to make Squaw Valley a destination resort. That has already happened. It does nothing but add more clutter and congestion to an area which is fast losing the open atmosphere and charm it once had. And as presently designed, it will severely impact the quality of life that long-time homeowners in the neighborhood have a right to enjoy.

My earlier letter, a copy of which is appended, summarized the injury we have experienced from development in the neighborhood-our view of the mountain cut in half by the Lodge development across the street, and the scene from our front windows dominated by a cement garage and a large dumpster. Now, as if to add insult to that injury, we are being asked to sit back, look at another dumpster and loading dock, and experience the morning sun being blocked out by a building literally looming over us which is an absolute behemoth compared to anything else on this side of Squaw Peak Road. The Inn's developer apparently wants to complete the conversion of this part of our street into an urban back alley. Is this an acceptable outcome? Absolutely not. So, after 33 years of paying revenue to the County, we feel justified in calling in our markers on this one. It is too much.

Lastly, the irony in this whole matter is that the owner of the property, who I understand is a gazillionaire and would hardly suffer if the project were denied, is intent upon engulfing his piece of Olympic history (the Inn) as well as the rest of the neighborhood with a knock-off of Intrawest. I only hope that the Planners and Planning Commission can see what the owner unhappily has not.

My thanks for your forbearance with the length of these comments.

Sincerely,

H. Spencer Bloch

54 Reed Ranch Road Tiburon, CA 94920-2083

Jums Sala

cc: Jay Ryder, President, Tram Condos Homeowners Assn. Rob Goldberg, President, Plumpjack Management Group

### RESPONSE COMMENTS

### H. Spencer Bloch, MD

### Response HSB-1

Comment noted. The County will consider this project based on its specific objectives, irrespective of previous, adjacent development approvals.

### Response HSB-2

The architect has indicated that there are several features of the project that have taken the adjacent neighbors views into consideration. A review of the building elevations illustrates that only the most southeasterly corner of the project, near the Squaw Valley Tram Structure, has six stories (actual 5.5 stories due to messanine). The majority of the project is proposed at five stories (actual 4.5 stories due to messanine). Likewise, the trash and loading area has been incorporated into the building and is not a separate, stand alone structure. This area has been placed in a location where the facade of the adjacent Squaw Valley Tram Condominiums does not have view windows (only small "bathroom-type" windows). Approval of the reduced setback will be considered in conjunction with the Use Permit considerations.

### Response HSB-3

This statement is in reference to the size and bulk of the nearby Village at Squaw Valley (Intrawest) development.

### Response HSB-4

Comment noted. While the Tram Building is for skiing and not living, it establishes a visual image, including its height. The proximity of the Intrawest development to the proposed project is also a comparable condition. The area or distance between the Intrawest development and the proposed project does not form a natural divide. Past and recent development within this general area, including the Intrawest development, establish a contiguous setting of similar development intensities and architectural features. This creates an alpine atmosphere throughout, not only for the proposed project. In addition, the project architect has indicated that the exterior fenestration has not yet been designed. Design review approval is also required.

#### Response HSB-5

Comment and opinion noted. Corrections on page 111 will be made to the text regarding building heights:

"Existing residential development to the west (two-story Squaw Valley Tram Condominiums) and south (three-story Squaw Valley Lodge Condominiums) of the proposed development area currently have views of mountain features that are unobstructed or substantially unobstructed to the east and north across the existing parking lot area."

#### Response HSB-6

The reference to "very little vegetation . . ." refers to the disturbed parking and basin areas. Other vegetation (e.g., trees) is present on the site as described on page 38.

### Response HSB-7

Comment noted. The percentage estimates used different baselines. For the hydrology/water quality percentage, the estimate was electronically calculated by the project engineers. For the biological resources percentage, the estimate was calculated through the use of a planimeter, a manual measuring device, thus explaining the difference. Text on page 56 will be revised:

"Currently, 50.8% of the site is covered with impervious surfaces, and the proposed project will result in a total of 67.7% of impervious surface coverage when completed."

Regarding development of the parking area, the commentor is correct regarding the loss of this area as a separation between the existing PlumpJack Inn and adjacent residences.

### Response HSB-8

Comment noted. Refer to HSB-2 and SVTCA-7. The findings included in the Final EIR that address the variance are reproduced as follows:

- a) A reduction in the front setback to 10' is not inconsistent with the setback reductions currently enjoyed by the Plumpjack Squaw Valley Inn (a commercial building) and the Tram Condominiums (a residential building). Both of these structures are situated 10' from the property line that fronts onto Squaw Peak Road. The Tram Building, located directly across Squaw Peak Road from the Plumpjack Squaw Valley Inn, enjoys a setback reduction of 2.5' from property line. The reduction in setback for the proposed residential expansion project will provide consistency in streetscape design with respect to nearby properties.
- b) Other properties have the option of applying for a variance given the same situation.

  Commercial properties and tourist accommodation properties are allowed a front setback of 10 feet according to the Squaw Valley General Plan and Land Use Ordinance.
- c) Multi-family Residential and Timeshare Condominiums are permitted uses in this Zone District. The Zone District is Village Commercial identified in the Squaw Valley General Plan.
- d) The granting of the Variance will not adversely affect public health or safety and is not materially detrimental to the public welfare, nor injurious to nearby property or improvements. The proposed plan has been preliminarily reviewed by the Squaw Valley Fire Department. They will be able to provide fire protection and the access will comply with their standards. The building will be fire sprinkled and other fire protection systems will be constructed with the building. The scope of the project is primarily on the property owned by PlumpJack with the exception of the improvements proposed to the bank of Squaw Creek. Improvements to Squaw Creek will help solve erosion problems and reduce impacts to Squaw Creek. The well will be designed to meet all State and County Health Department requirements. The proposed parking and roadway areas will comply with Placer County Development standards. The building will comply with the current Uniform Building Code and all Placer County Building requirements.
- e) The procedure for attaining a variance will comply with the Placer County General Plan and the Placer County Zoning Ordinance.
- f) Since it will be problematic to move the building back ten feet and given the constraints of the property, the requested variance is the minimum departure from the requirements of this ordinance.

### Response HSB-9

Comment noted. The calculations are correct with the lock-out units considered. Placer County does not require additional parking space to be provided for lock-out units.

#### Response HSB-10

Comment noted. Traffic congestion has been studied and mitigation measures developed. Mitigation measures are presented by a professional traffic/transportation consultant will assist in reducing project-related congestion.

### Response HSB-11

PlumpJack Squaw Valley Inn has an existing irrigation well that has been used for 15 years. A new well will be drilled and dedicated to the SVPSD. This well will then be operated in conjunction with the other wells in the SVPSD well field.

The projected use for PlumpJack is 14,600 gallons per day (GPD) in August with an average use of 7,300 gpd. These date include 2,500 gpd of irrigation pumping in August with average irrigation pumping of 1,000 gpd. Irrigation pumping has occurred over the last 15 years using the existing irrigation well. Therefore, the additional water use for the project has been reduced by 2,500 gpd during August to 12,100 gpd and by an average of 1,000 gpd to 4,840 gpd. See also response SVPS-17.

This well gives the SVPSD a well in a different part of Squaw Valley than the other wells in the well field. This adds flexibility in water system management for an increase in demand of 12,100 gpd in August and an average of 4,842 gpd.

The typical annual change in groundwater levels is 15 feet. The change noted was 12 feet and is due to seasonal variation.

### Response HSB-12

The proposed project will not increase the likelihood of flooding on adjacent properties. The final design of the project will include a detailed analysis of 100-year flood flows (including tributary areas upstream of the proposed project). The project will not be allowed to increase peak flows or increase the depth of flooding upstream or downstream of the project. The project will not block or cause flood flows to back up onto upstream properties.

### Response HSB-13

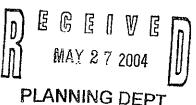
Comment noted. Any discharge of fill into Squaw Creek requires a number of resource agency permits an must be mitigated or compensated accordingly. Minimization measures are designed to limit or remove the potential of discharge occurring. Furthermore, the proposed bank stabilization techniques have had historical success in similar areas. Regarding justification of bank stabilization, the potential for a much higher degree of damage via erosion would occur if bank enhancement is not conducted.

## **Squaw Valley Tram Condominium Association** P.O. Box 3750 – 460 Squaw Peak Road

Olympic Valley, CA 96146

May 25, 2004

Michael Wells, Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA. 95603



RE: Comments to Draft Environmental Impact Report (EIR)- Plumpjack Squaw Valley Inn Expansion Project

The following are comments directed at this project that were not adequately addressed in the Draft EIR. I am a homeowner in the Squaw Valley Tram Condominiums (Unit #8) and I am also President of the Homeowners Association for the property. The Squaw Valley Tram Condominium property is located adjacent to the proposed project site on the westerly property line. Our property consists of a two-story, 13 unit building. At the closest point, the proposed building will be approximately 50' from a side of our building. Our property is the closest and by far most impacted property by the proposed project.

#### 3.0 **ENVIRONMENTAL ANALYSIS**

#### 3.1 LAND USE

### 3.1.3 Project Impacts and Mitigation Effects determined to be Less than Significant

This section states that the proposed project represents a continuation of land use types and densities with surrounding users. The proposed project is compatible only with the Intrawest Village, which is several hundred feet from the edge of this building. This section did not compare the proposed project to the adjacent uses represented by the Squaw Valley Tram Condominiums and the Squaw Valley Lodge.

SVTCA-1

#### Land Use

1.B.2 "The County shall encourage the planning and design of new residential subdivisions to emulate the best characteristics of existing, nearby neighborhoods." The planning and design of the proposed project only emulates Intrawest's Village at Squaw Valley.

SVTCA-2

The size and scale of the proposed building ignores all aspects of the character of its two closest neighboring properties, which are only 2-3 stories in comparison to the six stories proposed by this application.

1.B.9 "The County shall discourage the development of isolated, remote, and/or walled residential projects that do not contribute to the sense of community desired for the area." The size and scale of this building and its location only 10' from Squaw Peak Rd. do not contribute positively to the sense of community. It will dominate the street scene and tower over surrounding properties.

SVTCA-3

1.K.1 "The County shall require that new development in scenic areas is planned and designed in a manner which employs design, construction, and maintenance techniques that maintains the character of visual quality of the area." The consultant's comments again ignore the project's closest neighbors. The size, height, and scale of the building will dominate Squaw Peak Road and will eliminate view corridors, particularly from the Squaw Valley Tram Condominiums. Landscaping cannot mitigate or screen such a significant impact.

SVTCA-4

1.O.3 "The County shall require that all new development be designed to be compatible with the scale and character of the area. Structures, especially those outside of village, urban, and commercial centers, should be designed and located so that they do not silhouette against the sky above ridgelines or hilltops." The General Plan policy is completely violated by this proposed project. The consultant's comments again ignore all of the neighboring properties except for the Village at Squaw Valley for reasons that I have already stated in previous comments. The height and size of the proposed structure will certainly silhouette against the sky above ridgelines from surrounding properties, and in particular from the Tram Condominium property. A vivid example of this can be seen on Figure 3.7.B in the EIR. This is a photo simulation of the west side of proposed building that shows clearly how the building silhouettes against the sky above ridgelines.

SVTCA-5

1.O.10 "The County shall require that in downtown/village centers, the tallest buildings be clustered in the core area and that building heights transition down to the scale of buildings in the surrounding area." The consultant's response to this policy again only takes into consideration the Village at Squaw Valley and the Tram building, completely ignoring the Tram Condominium property as well as the Squaw Valley Lodge. The proposed project is less than 10' lower than the peak height of the Village and Tram buildings, but is 45' higher than the closest adjacent structure (Tram Condominiums). This is not transitioning as anyone would define. In order to comply with this General Plan policy the proposed structure

SVTCA-6

would need to be reduced in height or be located closer to the core area to the east of the project site.

### Impact LU-1 Project will require a setback variance

The reasons for the applicant's request for a setback variance appear to be based on being able to fix the structure on the property without impacting the creek to the rear of the building. A granting of this variance request would place this large structure only 10' from the edge of Squaw Peak Road, which is substantially closer than any surrounding building except for the Ski Corp's Tram building. As stated in previous comments the size and scale of the building are already incompatible with most surrounding uses and substantially block view corridors, particularly from the Tram Condominium property. The additional 10' requested variance only allows the proposed building to further block views and dominate the street scene on Squaw Peak Road.

SVTCA-7

The 10' variance is unnecessary and is needed for landscape screening and mitigation, as well as snow storage during the winter.

The fact that the proposed project has requested a 10' variance should signal the need for a reduction in the size and scale of the building to make the design more compatible with surrounding uses.

### Impact LU-2: Consistency with existing General Plan policies

The proposed use is stated here to be consistent with the Squaw Valley General Plan and Land Use Ordinances. I believe that this statement is incorrect because it again completely ignores The project's two closest neighbors. The height of the project at 69' may be slightly lower than the peak height of the Tram Building and Village, but it towers over the Tram Condominiums and Squaw Valley Lodge. While there is no specific height limitation in this district, it is obvious to see the inconsistencies. The consultant needs to address all surrounding properties, not just the properties nearby that support the project's design. Furthermore, as stated previously, the closest Village building is located several hundred feet from the proposed building. The Tram building is probably about 150' from the building. The Squaw Valley Lodge, by contrast, is located just across Squaw Peak Road (under 100') and the Tram Condominiums are located just 50' from the proposed structure. The closest adjacent uses should not be ignored by this EIR.

SVTCA-8

#### 3.7 Visual/Aesthetics

### Figure 3.7.B.

Figure 3.7.B vividly illustrates the views that Tram Condominium homeowners will have of the proposed project. The cars shown in the picture are located on the Tram Condominium property in the parking lot. The obstruction of views and sunlight can be imagined quite easily by looking at this illustration. The aesthetics of the wall facing our property is an obvious concern as well. The location of the loading dock and the ugliest elevation of the building facing our project is of strong concern. Additionally, the dominance of the building to the Squaw Peak Road street scene and the effect of the 10' setback variance is obvious in this illustration.

SVTCA-9

## 3.7.3 Project Impacts and Mitigation Effects considered not to be significant

This section incorrectly states that increased lighting will have no effect on surrounding properties and that the project site is not located adjacent to any existing residential uses (page 110-111). The Tram Condominiums are an adjacent residential use that will certainly be impacted by spillover light, glare, and exterior lighting. Impacts will be significant and mitigation measures should be required.

SVTCA-10

### **Potentially Significant Impacts**

Impact VIS-1: Construction of the six story residential structure could substantially alter and/or obstruct views from existing residential development.

This section incorrectly refers to the Tram Condominiums as three- story, when in fact it is two-story.

SVTCA-11

This section correctly states the virtual obliteration of the views currently enjoyed by Tram Condominium residents to the east. Sunlight will be non-existent until the sun rises high enough to clear the top of the six-story proposed structure.

The consultant then states that no mitigation is available. This statement is unacceptable and absurd. The proposed project should be reduced in size and scale so that it is compatible with neighboring uses. No setback variances should be granted.

### Transportation and Circulation - Section 3.12

This section of the Draft EIR is flawed due to the use of old data. The data used for this analysis predate the buildout of the Village at Squaw Valley, which has greatly changed traffic in the Valley. New traffic analysis must be done to determine the current traffic situation and mitigation that could be required for this project. A new traffic study must also address the Squaw Valley Rd/Squaw Peak Rd intersection, which has recently become very busy during the ski season.

SVTCA-12

### 5.2 Lower Intensity Alternative

The characteristics described in this section are of a three-story structure that could be proposed in lieu of the currently proposed six-story structure. The characteristics described would greatly mitigate many of the issues regarding the overwhelming size and scale of the current proposal. While views from the Tram Condominium property would still be altered, it would be a significant improvement from the current proposal. A project designed according to the characteristics of this lower intensity approach would be in compliance with all of the General Plan's goals regarding compatibility, transitioning of building heights, and overall mass and scale of a project on this property.

SVTCA-13

Thank you for the opportunity to comment on the Draft EIR for this project. I will be eager to receive responses to these comments.

Iav Ryder

President and Homeowner

Squaw Valley Tram Condominium Association

### RESPONSE COMMENTS

### **Squaw Valley Tram Condominium Association**

### Response SVTCA-1

Comment noted. The on-site and adjacent land uses compare favorably. Both are compatible residential uses. The proposed project is consistent with the site General Plan land use designation.

### Response SVTCA-2

Comment noted. The Draft EIR describes the proposed architecture as follows. "The proposed project would be designed as a mountain lodge consistent with the existing architecture of the area. Various mountain style architecture (e.g., stone walls, stone fireplaces, and stained wood paneling, as well as varied rooflines and angles giving a smaller Multi-structure fee), have been designed to blend in with the existing architecture of the area."

Design review approval is required and the architect has indicated that the exterior fenestration has not yet been designed. There are no specific height limitations in the District. Development intensity, including the size and bulk, are permitting in the General Plan land use designations and zoning district.

Nearby structures include the Tram building, the Village at Squaw Valley, the Squaw Valley Lodge and the Tram Condominiums. Building heights range from the two-story tram condominiums to 79 feet for the tram building. A review of the building elevations illustrates that only the most southeasterly corner of the project, near the Squaw Valley Tram Structure, has six stories (actual 5.5 stories due to mezzanine). The majority of the project is proposed at five stories (actual 4.5 stories due to mezzanine).

#### Response SVTCA-3

Comment noted. The proposed PlumpJack project is adjacent to other residential uses and is not isolated or remote. New sidewalk fronting the street is proposed, and the courtyard area is open to this sidewalk. The area will not be fenced or walled off. Development intensity, including the size and bulk, are permitting in the General Plan land use designations and zoning district. There are not specific height limitations in this zoning district. As noted in the EIR Impact VIS-1, obstruction of adjacent views cannot be avoided with a six-story building. Thus the impact on visual resources is considered significant and cannot be mitigated. Approval of the reduced setback will be considered in conjunction with the Use Permit considerations. See also response SVTCA-2 and Response HSB-8.

In addition to comparing the actual building heights of the surrounding structures, the elevation of the building's highest point was also reviewed. When comparing the structures in this manner, the Intrawest project has the highest roof elevation (6,330), the tram building is lower by approximately 5 feet at (6,325), the proposed PlumpJack expansion would be 17 feet lower than Intrawest at (6,313) the Squaw Valley Lodge would be at (6,298), 31 feet lower than Intrawest and the Tram Condos are 62 feet lower than Intrawest (6,268).

Although the Squaw Valley Lodge is only three stories tall verses the proposed PlumpJack expansion which is five and a half stories tall, the difference between the elevation of the highest roof ridge is only 15 feet. Please note that the Tram Condominiums are located in a different land use designation, High Density Residential rather than Village Commercial.

#### Response SVTCA-4

Comment noted. See response HSB-2, SVTCA-2 and SVTCA-3.

#### Response SVTCA-5

Comment noted. It is not necessary to address neighboring properties in responding to Land Use Policy 1.0.10, therefore no text change is required. Please note that this project area is located in an area that is zoned Village Commercial. See response SVTCA-3, SVTCA-2, HSB-2, SVTCA-9.

### Response SVTCA-6

Comment noted. The language for the response for general plan policy 1.0.10 has been revised from, "The proposed building is clustered next to the tram building, the tallest existing building in the area. The tram building height is comparable to the proposed structure" to "The proposed building is adjacent to the 79- foot tram building and across the street from the 77-foot tall Village at Squaw Valley. The proposed building is also adjacent to the two-story tram condominiums and across the street from the three-story Squaw Valley Lodge. The tallest buildings remain in the Village core area, and are adjacent to smaller multi-family residential buildings."

Alternatives to the proposed project (including a lower structure) are discussed in Section 5.0 Alternatives Analysis. See also comment response SVTCA-5 and SVTCA-2.

### Response SVTCA-7

Comment noted. The required rear setback for this property is 10 feet. The PlumpJack expansion is proposing placing the expansion 20 feet from the rear property line, rather than the required 10 feet. The structure could be placed 10 feet from Squaw Creek, but requested a variance to the front setback to place the building footprint closer to the street. This was considered preferable to placing the structure closer to Squaw Creek. However, Granting of the variance will be a County decision that considers the potential implications of the project. Landscaping in front of the building is proposed. Also refer to Response HSB-8.

The site of the proposed building is an existing paved parking area. Snow is currently being removed from this paved area. The proposed project will remove this existing paved parking area and replace it with a building that includes parking under the building. This will eliminate the need for snow removal from the existing paved parking area. The area within the proposed 10' setback and the proposed landscape areas on-site will provide adequate area for snow storage. See response HSB-2 and MWE-5.

### Response SVTCA-8

See response SVTCA-2, SVTCA-3, and HSB-4.

### Response SVTCA-9

Comment noted. The EIR indicates that the loss of views and sunrises will be significant and cannot be mitigated. The project architect has indicated that the exterior fenestration has not yet been designed. Design review approval is also required. Also refer to HSB-2.

### Response SVTCA-10

Comment noted. The light and glare effects are not expected to be significant from the development. All project lighting would be oriented away from adjacent uses and shielded where necessary to control glare. The statement in the EIR is clarified as follows:

"The primary adverse effects of spillover light on residences comes from very bright exterior lights which can result in night lighting interior rooms through windows. Given the distance to adjacent residences and the nature of the proposed lighting (including shields on outdoor security lighting), the increased lighting is not expected to adversely effect the behavior of people because the project site is not located adjacent to any existing residential uses with private yards. Therefore impacts associated with light and glare are considered less than significant (Significance criteria VIS-e)."

### Response SVTCA-11

Comment noted. Reference to Squaw Valley Tram Condominiums to two-stories has been corrected. Also refer to comment HSB-5.

### Response SVTCA-12

For the purposes of this analysis, existing conditions do not include improvements associated with the Village at Squaw Valley USA. The Village is evaluated as a future condition, which was correct at the time the notice of preparation was filed for the PlumpJack project.

### Response SVTCA-13

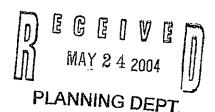
Comment noted. This alternative was included in the DEIR to show the difference between a three-story project (alternative) and the proposed project (at six-stories).

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## McDermott, Will & Emery

May 19, 2004



Michael Wells Senior Planner Placer County Planning Department 11414 B Avenue Auburn, CA 95603

Re: Plum

Plumpjack Squaw Valley Inn Expansion - Comments on Environmental Impact Report (1970 Squaw Peak Road, APN 096-020-023)

Dear Mr. Wells:

I write in my personal capacity in connection with the planned expansion of the Plumpjack facility on Squaw Peak Road, Olympic Valley. My family has owned a condominium in Olympic Valley for 33 years, and has been adjacent to the Squaw Valley Inn (now the Plumpjack facility) for 27. We are quite concerned that the proposed Environmental Impact Report has failed adequately to take the needs and interests of longtime residents and property owners into account.

In particular, the Environmental Impact Report indicates that the proposed six-story expansion "will have an adverse effect on short-term views from adjacent residential vantages" (p. 2). It is unclear why the Commission asserts that the impact will be short-term. In fact, the erection of a permanent six-story structure will have a permanent impact on views both from adjacent residential vantages and from sightlines as far away as the Olympic Village Inn across Squaw Creek. The Report suggests that "[t]his would not be characterized as being a substantial change or alteration of the existing views, because views of the mountains are currently obstructed in many other areas of the Valley due to existing development" (p. 109). I am aware of no legal basis for the bizarre egalitarian implication of this statement—because some views are obstructed in other areas of the Valley, the Commission should turn a blind eye to any new construction that will have the same effect in yet other parts of the Valley. To the contrary: the Commission can and should act here, regardless of whether it acquiesced in prior projects that obstructed the views of other residents.

Having first concluded that the proposed construction project will have only a "short term" effect on existing homeowners and long-time residents, the Report then reaches the puzzling conclusion that there is "no mitigation available" to reduce these disproportionate impacts. This

MWE-1

MWE-2

Michael Wells May 19, 2004 Page 2

clearly is not the case. The Report concedes that the proposed expansion will be "a dominant visual element" (p. 109), but offers no compelling need to condone such a project in the first place. The Plumpjack's investors will more than recoup their investment with a single- or two-story structure, or with a commercial (rather than residential) development of similar size. Put simply: The proposed Plumpjack expansion is too big. It can and should be reduced in size, scale, and intrusiveness.

The Report reaches a counterfactual result when it considers reduced-intensity and commercial-use alternatives to the proposed project. A fifty percent reduction in the size of the proposed project would allow for a variety of initigating improvements (the maintenance of the existing tree-line dividing the Squaw Valley Inn from the adjoining Tram Condominiums, for example). Moreover, the mere fact that the project would be three stories tall, rather than six, would substantially lessen the impact on existing residents. The commercial use alternative would also significantly mitigate the harms caused by the existing proposal—there are virtually no multistory commercial buildings in this part of Olympic Valley, and the difference in vehicle and pedestrian traffic would be negligible.

This highlights the fundamental problem with the proposed expansion. The proposal makes no effort to comply with the Placer County General Plan. For example, in violation of Policies 1.K.1 (b) and 1.K.5, the plan incorporates *no* design or screening measures to minimize the visibility of the six-story structure. Instead, the proposal envisions the removal of all trees dividing the Squaw Valley Inn property from the Tram Condominiums property along with a variance allowing the structure to reach right to the edge of Squaw Peak Road. It will, in effect, fill all available space, horizontally and vertically, to a height of six stories. This is flatly inconsistent with the dictum that plans should minimize the visibility of structures and graded areas. The 1983 Squaw Valley General Plan and Land Use Ordinance is to the same effect, and also has been ignored. A six-story structure reaching to the very edges of the respective property lines has not been placed "so as to minimize [its] visual impact."

The Environmental Impact Report suggests that the proposed Plumpjack project "will be of the same style and décor as the surrounding community to maintain the small village atmosphere required by the Squaw Valley General Plan" (p. 109). But "style and décor" are not the issue; rather, the sheer size of the project is inconsistent with any semblance of "small village atmosphere."

Similarly, Placer County General Plan Policy 1.O.3 requires that "all new development be designed to be compatible with the scale and character of the area." On the question of scale, the proposed Plumpjack expansion is totally disproportionate to the surrounding area. The only structure of comparable size is the Tram Building itself—and as the Report notes, "the tramway lift that connects the base of the mountain to High Camp" is one of the Valley's freestanding visual elements (p. 100). Put another way: The Tram Building is part of the landscape. The Plumpjack is not, and there is no reasonable argument that a six-story hotel is "compatible with the scale and character of the area." It will not fit the natural terrain, and the building—which will be far and away the largest structure in this part of the Valley—clearly will detract from the

MWE-4

MWE-5

MWE-6

Michael Wells May 19, 2004 Page 3

natural background and ridge outlines, particularly for anyone situated west of the new development. Indeed, it will create a virtual urban corridor looming over the two-lane road leading to the new Intrawest development and ticket sales offices.

This highlights the other key flaw in the draft Report. It is oriented entirely toward tourists entering Olympic Valley and staying in the new Intrawest facility. It may be true that "[f]rom Squaw Valley Road, motorists would primarily view the existing PlumpJack Squaw Valley Inn, however with the new buildings rising above in the background" (p. 100). From the opposite direction, the opposite is true. At present, the viewer traveling east on Squaw Peak Road has a view of trees and mountain peaks; following the completion of the Plumpjack expansion, he will be faced with a six-story apartment complex, blocking out the peaks and ridges all along the lefthand side of the road. This has a highly significant impact on existing visual quality of the project site, which the Report does not consider at all. The same bias exists throughout the Report. Indeed, at one point the Report boldly notes that "the project site is not located adjacent to any existing residential uses, with the exception of the existing Squaw Valley Inn" (p. 111). The inescapable conclusion is that the Tram Condominiums—which are right next to the project site, whether or not the Report cares to admit it—will simply be ignored. This is an unwise and actionable course of conduct.

Personally, I urge the Commission to reject the proposed project in its entirety. It flunks the bedrock test of development in Olympic Valley: "to create a visually and socially attractive setting." But if you do not, the "unavoidable adverse impacts" cited in the Report can be substantially lessened by restricting the number of units, the height of the structure, or the physical footprint of the expansion (as proposed by the "lower intensity alternative" on pp. 157-159), or by adopting the commercial-use alternative discussed in the Report.

Please call or write with any questions. Thank you.

David S. Bloch

<sup>&</sup>lt;sup>1</sup> Perhaps the most amusing example of this systematic bias appears on page 110 of the Report, which notes that "[t]he proposed increase in light would be visibly noticeable and could disturb residents in adjacent areas of the project site (e.g., existing PlumpJack Squaw Valley Inn)." The only "adjacent area" the author of the Report mentions is in fact the Plumpjack facility itself. No mention is made of the *non-Plumpjack* homeowners living alongside the proposed development.

## RESPONSE COMMENTS

#### McDermott, Will and Emery

#### Response MWE-1

Comment noted. Short-term views refers to the views in the foreground, as opposed to views of a mid-range or long-range distance. With the proposed project, since the structures will be higher than the surrounding structures, the views of the immediate foreground area will be affected. Mid-range and long-range views will be less affected since background features will remain visible (depending on location) due to higher elevations. Refer to response HSB-2, and SVTCA-9.

#### Response MWE-2

Comment noted. The EIR findings are not expected to condone or condemn the project. Rather, it is the objective of the EIR to present an objective perspective of the existing conditions compared with the proposed conditions with project. Alternatives to the proposed project (including a lower structure and alternative uses) are discussed in Section 5.0 Alternatives Analysis.

## Response MWE-3

Comment noted. Some of the environmental effects outlined with the alternatives, in comparison with the proposed project, will be reduced. For the commercial alternative, it would be expected that traffic impacts would increase due to the higher traffic generation rates for commercial uses (when compared with residential).

#### Response MWE-4

Comment noted. 1.K.1b reads that the County shall require that new development in scenic areas is planned and designed in a manner which employs design, construction, and maintenance techniques that incorporate design and screening measures to minimize the visibility of structures and graded areas.

For design measures also refer to response HSB-2. Page 33 of the DEIR, 1.K.5 states that "New parking areas are indoors and will not be visible. No new roads are proposed. All utilities will be placed underground." Refer also to response SVTCA-2, SVTCA-3, and SVTCA-9.

This project provides 35% open space, and development is proposed to be set back 10 feet from the front property line, 5 feet from the side and 20 feet from the rear property line (required rear setback is 10 feet). Please refer to Figure 2.3.A, the proposed site plan. 149 bedrooms are proposed and the Squaw Valley General Plan allows 160 bedrooms. Allowable site coverage is 30% and the project proposes 20.4% site coverage. If the proposed variance is approved by the County, the structure will be set back 20 feet from Squaw Creek and 10 feet from Squaw Peak Road. Refer also to response HSB-2.

## Response MWE-5

Comment noted. Development intensity, including the size and bulk, are permitting in the General Plan land use designations and zoning district.

Response MWE-6 Comment noted. Refer to Response MWE-4.

Response MWE-7 Comment noted. Refer to response SVTCA-10

Response MWE-8 Comment noted. Refer to response MWE-3.

## MANAGEMENT

May 26, 2004

MAY 2 8 2004

PLANNING DEPT.

Michael Wells, Senior Planner Placer County Planning Department 11414 B Avenue Auburn, California 95603

Re: Draft EIR Comments - Plumpjack Squaw Valley Inn Expansion Project

The following are comments directed at this project which I feel have not been adequately addressed in the Draft EIR. Granite Peak Management is the Managing Agent for four Homeowner Associations, comprising of 263 owners, located on Squaw Peak Road. One being Squaw Valley Lodge located directly across the street from the proposed project and Squaw Valley Tram Condominiums located on the adjacent property to the west.

The intention of these comments is to bring to light aspects which affect these Homeowner Associations adjacent to the proposed project.

- 1. Land Use Section 3.1
  - I. Effects Determined to be Less Than Significant. The proposed project of this height and mass does impact adjacent lands and must be mitigated. The lone fact Section 3.1 doesn't compare the land use of the proposed project to two of its adjacent neighbors, Squaw Valley Lodge and Squaw Valley Tram Condominiums, makes this section of the EIR flawed. The consultant continues to equate to the Village at Squaw Valley as a similar project, but this proposed project is different in that it is adjacent to residential neighborhoods. The Village at Squaw Valley is surrounded by Village Commercial zoned properties, not residential.

The proposed project is not consistent with the following policies of the Placer County General Plan (Section 3.1.3):

a. 1.B.2: "The County shall encourage the planning and design of new residential subdivisions to emulate the best characteristics of existing, nearby neighborhoods." While the design of this subdivision is similar to the Village at Squaw Valley, in no way does it emulate the Squaw Valley Lodge (3 stories) and Squaw Valley Tram Condominiums (2 stories). The proposed building takes on no aspects of these buildings. The proposed project creates a towering feel to the adjacent properties and in no way can landscape or such mitigate its size.

b. 1.B.9: "The County shall discourage the development of isolated, remote, and/or walled residential projects that do not contribute to the sense of community desired for the area." The location of the proposed building is "up front" and "in your face". In no way does this project contribute to the sense of community. Its mass will dominate all aspects of the community of Squaw Peak Road and residents will lose a tremendous view corridor.

c. 1.K.1.c: "The County shall require that new development in scenic areas is planned and designed in a manner which employs design, construction, and maintenance techniques that: maintains the character of visual quality of the area." It is stated that the "design of the building is consistent with the visual character of the area," this is not true. The proposed project will be the largest building located on Squaw Peak Road. It will completely destroy the view corridor of the Squaw Valley Tram Condominiums.

GPM-4

d. 1.Q.3.a: "The County shall require that all new development be designed to be compatible with the scale and character of the area. Structure, especially those outside of village, urban, and commercial centers, should be designed and located so that: they do not silhouette against the sky above ridgelines or hilltops." It is stated "the building, located in the valley, will not silhouette against the sky above ridgelines or hilltops." This is complete false. I would state if you were to be standing on the street or some 250 feet away, if not more, from the proposed building, the ridge line would be block in some way from any direction.

GPM-5

e. 1.O.10: "The County shall require that in downtown/village centers the tallest buildings be clustered in the core area and that building heights transition down to the scale of buildings in the surrounding area." The consultant's response to this is absurd. How does this response apply to the policy? Where are the building heights transitioning down to the scale of the Squaw Valley Tram Condominiums. If the consultant is stating going from a height of 79 feet of the Tram (Ski Corp.), to 69 feet of the proposed project and down to 23 feet of the Squaw Valley Tram Condominiums, is transitioning down, they are mistaken. The proposed project must transition more dramatically to be in scale with surrounding buildings outside the village.

GPM-6

II. Impact LU-1: Project will require a setback variance. The sole reason for this request (50% reduction) is to accommodate the size of this project, so as not to propose a smaller building. In addition, it appears as though various parts of the building cantilever over the foot print of the building and are within the 10' setback. Do any parts of the building extent into the proposed 10' setback variance, like roof eves or cantilevered living space?

A setback variance may be granted but findings must be made in order for the variance to be granted.

- a. "There are special circumstances applicable to the property, including size, shape, topography, location or surroundings, and because of such circumstances, the strict application of this chapter would deprive the property of privileges enjoyed by other property in the vicinity and under identical zoning classification." It is my understanding that all identical properties in the vicinity have used the required rear set back of ten feet and the twenty foot front set back. They have worked in the confines of Squaw Creek. So, the proponent is not loosing any privileges otherwise enjoyed by other properties. What is the proposed rear set back? If it is at ten feet as required, I would state that this variance request is allowing the proponent to build a larger building.
- b. "The granting of the Variance does not under the circumstances and conditions applied in the particular case adversely affect public health or safety, is not materially detrimental to the public welfare, nor injurious to nearby property or improvements." It is incorrect to state the Variance is not materially detrimental to the public welfare, nor injurious to nearby property or improvements. First, the consultant admits there is no mitigation available for the "Visual/Aesthetics (Section 3.7)" impact on adjacent properties. So, by the project requesting an additional 10' variance and thus the building moving forward 10' to the South, this would only compound the lack of mitigation of the proposed building. The building height and mass significantly affects Squaw Valley Tram Condominiums view corridors and is that much closer to Squaw Valley Lodge and its northern views corridor.

The Squaw Valley Tram Condominiums will be shaded by this proposed building. As the consultant has stated in Section 3.7.3, Impact VIS-1, "the Squaw Valley Tram Condominiums will be effectively obstructed until the sun raises high enough to clear the top of the six-story structure." When will it clear the top of the six-story structure? Maybe never? The building will effectively shade the building without granting this variance and an additional 10 feet with the granting of the variance will only compound the problem. This could effectively reduce property values of the area. In addition, maintenance issue during winter conditions will be created, such as, ice and ice dams.

In addition, the 20' setback is partially required to accommodate Squaw Peak Road and the proposed project snow storage. By reducing the snow storage area by 50%, were is it proposed to store snow from the project and its share of Squaw Peak Road? This is a serious issue at this end of Squaw Valley with little winter sun. If granted, the neighboring properties will be burdened with the proposed projects snow.

3PM-8

c. "The Variance is the minimum departure from the requirements of this ordinance necessary to grant relief to the applicant with Subsections a and b above." The response to this finding is flawed. It is stated "it will be problematic to move the building back ten feet and given the constraints of the property, the requested variance is the minimum departure from the requirement of this ordinance.

GPM-10

First, does this mean it is possible to build this project without a setback variance, just "problematic"? If so, I would argue that the project work within the current ordinance. This "minimum departure" is not minimum, but rather 50% of the allowable setback and closer to maximum.

III. Impact LU-2: Consistency with Existing General Plan Policies. I do not believe the proposed use is consistent with the Squaw Valley General Plan and Land Use Ordinance. While it is true there is "no specific height limitations in this district, the proposed height of 69 feet is not consistent with an adjacent building at Squaw Valley Tram Condominiums at an estimated 23 feet, but rather injurious. The General Plan Policies does state that the height should be reviewed when existing buildings are impacted. I assume this language is to prevent this such case of a building being three time as tall as one 40 feet away.

GPM-11

#### 2. Visual/Aesthetics - Section 3.7

I. Impact VIS-1: Construction of the six-story residential structure could substantially alter and/or obstruct from existing residential development. To except no mitigation to reduce or eliminate the adverse effects from the six story (69 feet) residential structure on views from existing residential development is absolutely unacceptable. This project is pushing the envelope of the property and this is just another aspect which will directly impact adjacent property owners adversely. If no such mitigation is available, the proposed project should be reduced in size until adverse effects are eliminated or reduced.

GPM-12

It is not just the mass of the proposed project, but the increase of lighting which will spill over into adjacent properties creating impacts needing to be mitigated. The consultant is mistaken in stating on page 110, "The primary adverse effects of spillover light.....it is unlikely that increased lighting would adversely affect.... because the project site in not located adjacent to any existing residential uses." This is completely the opposite; you have hundreds of residential units in adjacent projects. What is the proposed requirement for exterior lighting and there location?

Transportation and Circulation – Section 3.12

I. This whole section of the Draft EIR is flawed due to the use of old data. The projected impacts have been determined based upon Pre-Village at Squaw Valley numbers. I would state that the Village has created new impacts on our Transportation and Circulation numbers, especially in the village core were this proposed project is located. Existing traffic volumes are based on Pre-2000 numbers

and turning movements are from 1999. New studies must be preformed to properly access impacts of this project.

II. Squaw Valley Road and Squaw Peak Road. The impacts of the proposed project on Squaw Valley Road and Squaw Peak Road have not been addressed properly and no mitigation offered. First, as stated above, "pre-village" studies have been used. This intersection serves an estimated 364 residents, Squaw Valley Lodge, GPM-14 Plumpjacks, a church, a popular hiking trail and Squaw Valley Ski Corporations loading dock. In addition this is the focal point of the base ski area with ticket portals and a loading/unloading area for day users. Bottom line, between cars and pedestrians, it is a zoo with no controls. As development continues with this proposed project, mitigation must identify and installed at this intersection which this proposed project will incur.

The proposed project will increase car and foot traffic. What are the proposed mitigations for the intersection of Squaw Valley Road and Squaw Peak Road?

Thank you for the opportunity to comment and I await your response.

Very truly yours,

On behalf of:

Squaw Valley Lodge Owners Association: 201 Squaw Peak Rd., Olympic Valley, CA 96146 Squaw Valley Tram Condominium Association: 460 Squaw Peak Rd., Olympic Valley, CA 96146 Squaw Valley Apartments Association: 445/450 Squaw Peak Rd., Olympic Valley, CA 96146

Evan Benjaminson,

Principal

## RESPONSE COMMENTS

## **Granite Peak Management**

## Resopnse GPM-1

Structure height is addressed in Section 3.7 of the EIR, Visual/Aesthetics. Section 3.7.4 Level of Significance After Mitigation states that the proposed project will result in a significant impact on visual resources (views) for the proposed expansion and no mitigation measures are available for this impact. See also response SVTCA-9.

Structural mass is addressed in Section 3.1 Land Use. Please refer to the Planned Development Ordinance (PD) calculations that show the proposed project in compliance with the number of bedrooms per acre as well as allowable gross floor area. Refer to section 3.7 for visual/aesthetic issues regarding the proposed structure. See also response SVTCA-1.

The following sentence has been added to Section 3.1.3 of the DEIR to include Squaw Valley General Plan zoning designations for surrounding properties. The following has been inserted, "The following surrounding properties are zoned Village Commercial (in which multi-family residential and timeshare condominiums are a permitted use): The PlumpJack Squaw Valley Inn, Squaw Valley Lodge (South), Squaw Valley Tram Building(South), and the Village at Squaw Valley (East). The Squaw Valley Tram Condominiums located to the West are zoned High Density Residential and Squaw Creek located to the North of the project area is designated Conservation Preserve." See also comment HSB-2 and SVTCA-6.

## Response GPM-2

Comment noted. See response SVTCA-2, SVTCA-3, and MWE-5.

#### Response GPM-3

Please refer to response SVTCA-3 and HSB-2.

## Response GPM-4

Comment noted. Visual character is discretionary and therefore the EIR includes Design review approval as stated in Section 2.5 of the DEIR. See also response SVTCA-2, HSB-2 and SVTCA-9.

#### Response GPM-5

Comment noted. Policy 1.O.3a is addressed in this comment response and that this County policy is written especially for those projects outside of village, urban and commercial centers.

The language in this response has been changed from, "The building, located in the valley, will not silhouette against the sky above ridgelines or hilltops. Colors and materials for the structure will be selected to help blend with the natural background. The natural terrain is flat and the structure will work with the natural terrain. Roof lines and vertical architectural features blend with and do not detract from the natural background or ridge outline" to "This property is zoned "Village Commercial". The building, located in the valley, will not silhouette against the sky above ridgelines or hilltops. The mountains behind the proposed PlumpJack Squaw Valley Inn are massive and will remain the primary visual focus. The proposed building will be below the ridgeline of the Tram building and the Village at Squaw Valley. The building will be above the ridgeline for the Tram

Condominiums and just above the ridgeline of the Squaw Valley Lodge. Colors and materials for the structure will be selected to help blend with the natural background. The natural terrain is flat and the structure will work with the natural terrain. Roof lines and vertical architectural features blend with and do not detract from the natural background or ridge outline." See also response SVTCA-5 and SVTCA-3.

## Response GPM-6

Comment noted. Refer to response SVTCA-6

## Response GPM-7

Comment noted. See response SVTCA-3. It is not anticipated that roof eaves will be within the proposed 10-foot front setback, however, Section 17.54.150 of the Placer County Zoning Ordinance states that, "Certain building, roof and wall features and building equipment, including but not limited to chimneys (only those without foundations and which do not touch the ground (e.g. cantilevered chimney chases on the second story of a residence, etc.)), bay windows, cornices, eaves, canopies, landings, stairways, and similar architectural features (not including decks thirty (30) inches or more above natural grade, porches, or other indoor or outdoor living areas), and equipment such as solar collectors and air conditioning equipment may extend into required setbacks as follows, where consistent with the requirements of Section 504 and Section 1711 of the Uniform Building Code: front and rear setbacks-such features and equipment may extend into any required front or rear setback a maximum of five feet; provided, that any equipment (other than window-mounted air conditioners) shall be screened from the view of any public road." Cantilevered living space is not permitted in the setback per the Placer County Zoning Ordinance, and is not proposed.

## Response GPM-8

The project proponent is not proposing non-compliance with the rear setback. In fact the proposed project is set back 20 feet from Squaw Creek, and the rear setback requirement is 10 feet. See also response SVTCA-3.

#### Response GPM-9

Comment noted. Granting of the variance will be a County decision that considers the potential implications of the project. By adjusting the building setback line, the line of sight from adjacent vantages could be affected accordingly. The EIR acknowledges the potential impacts from constructing the six-story structure on the project site.

Although a sun/shade analysis was not conducted for the project, the angle of the sun and the sun exposure to the Squaw Valley Tram Condominiums will vary in accordance with the time of year. In the summer, with the sun higher in the sky, the sun exposure will be greater than during the winter season. In the absence of a sun/shade analysis, the effects from additional ten feet adjustment to the setback line on shading cannot be precisely determined. However, the sun angle is lower or greater from a southerly direction. Since the setback adjustment is proposed on the north side, it would appear that there would be no effect or an imperceptible effect.

There currently is a shading effect with the existing pine trees. With the proposed six-story structure, shading, including potential ice accumulation from shading, is not expected to be significantly different than the existing condition.

## Response GPM-10

Comment noted. Granting a variance will be a County decision that considers each finding listed in Impact LU-1. Refer to response HSB-8. The use of the word "problematic" refers to item (a) in the rational for the Variance approval (Impact LU-1); "Moving the building back ten feet would move it closer to Squaw Creek which may cause impacts to the creek and the limits of the 100-year floodplain and the 100' setback from the centerline of Squaw Creek. The location of the proposed building is the narrowest portion of the property."

#### Response GPM-11

See response SVTCA-2, SVTCA-3 and SVTCA-6.

## Response GPM-12

Comment noted. See response MWE-3 regarding project alternatives. Refer to response SVTCA-10 regarding lighting.

## Response GPM-13

For the purposes of this analysis, existing conditions do not include improvements associated with the Village at Squaw Valley USA. The Village is evaluated as a future condition, which was correct at the time the notice of preparation was filed for the PlumpJack project.

## Response GPM-14

The Squaw Valley Road/Squaw Peak Road intersection is stop-controlled on the eastbound (Squaw Peak Road) and southbound (Squaw Valley Road) approaches. As this analysis was initiated prior to Village construction, existing conditions do not include improvements associated with the Village at Squaw Valley USA. That is, "pre-Village" conditions are analyzed. Under pre-Village conditions, all approaches on the Squaw Valley Road/Squaw Peak Road operated at a good Level-Of-Service (LOS B or better), with or without the PlumpJack project.

The Village is evaluated as a future condition, which was correct at the time the notice of preparation was filed for the PlumpJack project. Under future conditions (with the Village), the LOS at this intersection is not expected to deteriorate. In order to verify this statement, P.M. peak-hour turning-movement counts were conducted at the Squaw Valley Road/Squaw Peak Road intersection by LSC staff on Saturday, March 26, 2005. According to Squaw Valley Ski Corp staff, the total lift ticket sales on the day the counts were performed equates to about 75 percent of the sales on the peak winter day, which typically occurs during earlier winter months. Therefore, the counts represent a relatively busy winter day with the first two phases of the Village complete. Table 1 summarizes the intersection turning-movement count data. As indicated, the peak hour occurred from 4:00 p.m. to 5:00 p.m., and the total traffic volume through the intersection during this period was approximately 252 vehicles.

In addition, the queue lengths on the eastbound and southbound approaches were recorded every 30 seconds. The average queue length on the eastbound (Squaw Peak Road) approach during the peak hour is less than 1 vehicle. The calculated average delay per vehicle on this approach is approximately 19.8 seconds, which equates to an acceptable LOS C. Similarly, the average queue on the southbound (Squaw Valley Road) approach is less than 1 vehicle, with a calculated average delay

of 5.4 seconds per vehicle (LOS A). Although the average delays would increase slightly with the addition of PlumpJack project-generated traffic and pedestrians, the LOS would not be affected.

Finally, future phases of the Village are planned to eliminate the existing day-skier parking lot located between Phase One of the Village and Squaw Creek. As a result, the number of pedestrians walking from the day-skier parking lot through the Squaw Valley Road/Squaw Peak Road intersection would be reduced. Therefore, it can be concluded that under future conditions (with the Village), the LOS at this intersection is not expected to deteriorate. Consequently, no mitigation is necessary.

## **WAJIH SLEIMAN**

#1, Prado Secoya. Atherton. CA 94027. Telephone 650-323-6656. Fax. 650-324-9170. Email wajihsleiman@yahoo.com

## May22,2004

Michael Wells, senior planner Placer County Planning Department 11414 "B" Ave. Auburn, CA 95603

#### Subject: PlumpJack Squaw Valley Inn Expansion Project

## Dear Mr. Wells:

Some of my main concerns about the Inn Expansion are;

1- The height that will block views from the condos at the Squaw valley Lodge.

2- The increased traffic at the side street facing the Lodge. As it is the traffic is bad during the skiing season. Considering the traffic from the Lodge garage, and traffic going into the expansion will be a bottleneck. Entrance to the expansion

- must be considered from the main road facing the existing outdoor parking of the village and the conference hall of the Inn.
- 3- The increased population in the area will impact the water, sewage and garbage generated.

4- There will be little open apace left surrounding the Inn, a matter that must be given due consideration.

WS-4

WS-3

**WS-1** 

Wajih and Nayla Sleiman Units 524, and 329

Mafe Semin

Squaw valley lodge

MAY 28 2004

PLANNING DEPT.

## RESPONSE COMMENTS

## Wajih and Nayla Sleiman, Squaw Valley Lodge

Response WS-1, HSB-2, SVTCA-9, and MWE-1.

Comment noted. See response HSB-2. As noted in the EIR Impact VIS-1, obstruction of adjacent views cannot be avoided with a six-story building. Thus the impact on visual resources is considered significant and cannot be mitigated.

## Response WS-2

With the proposed project, the PlumpJack driveways along Squaw Peak Road are expected to generate up to 14 inbound vehicles and 32 outbound vehicles during the peak hour. The Squaw Valley Lodge contains approximately 200 units. Based on the same trip generation rates applied to the PlumpJack units, the Squaw Valley Lodge is estimated to generate about 37 inbound and 86 outbound vehicle trips during the peak hour. Assuming all the PlumpJack vehicles use one driveway along Squaw Peak Road directly opposite a Squaw Valley Lodge driveway (in reality, the PlumpJack traffic would be distributed to multiple driveways), all approaches on the Squaw Peak Road/PlumpJack/Squaw Valley Lodge intersection would maintain a good LOS (LOS B or better). Furthermore, there are no driver sight distance deficiencies at this location that would impact traffic operations along Squaw Peak Road. This information will be added to the revised traffic study.

## Response WS-3

Comment noted. Water, sewer and trash collection services will increase with the additional residential uses. However, as noted in the EIR, these services can be accommodated by the service/utility agencies without generated a significant impact.

#### Response WS-4

Comment noted. Refer to response MWE-5.

Fred Ilfeld <ilfeldsonthemountain@hotmail.com>

To:

<mwells@placer.ca.gov>

Date:

5/30/04 12:03AM

Subject:

Comments on draft EIR for Plumpjack expansion

Dear Mr. Wells,

I am a Squaw Valley resident and a member of the Squaw Valley Municipal Advisory Council. After reviewing the draft EIR for the Plumpjack expansion I have several concerns to pass on.

Page 32: 1.B.2 (land use) the County shall encourage the planning and design of new residential subdivisions to emulate the best characteristics of existing nearby neighborhoods. Comment: This design is said in the EIR to be similar to the Village at Squaw Valley. I very much disagree. It looks more like an urban apartment building than a mountain lodge-mostly because of the sheer character of the outside walls. There are no decks (as at the Village) or other architectural features breaking up the flat, sheer outside walls.

Page 34: 1.0.10 the building heights transition down to the scale of the buildings in the surrounding area. Comment: the EIR references the Cable Car/ Tram building as a standard in terms of height. I feel this is most inappropriate, since it is not a comparable type of structure and since it is not nearly as massive as the proposed unit will be. I feel a more appropriate standard lies immediately across the street to the south- the Lodge at Squaw Valley. The height should be roughly comparable to that development.

Pages 34-5: IMPACT LU-1 setback variance. The project will require a setback variance of 10 feet from the required setback standard of 20 feet. Comment: I do not find the rationale of this being a commercial/ tourist property very compelling. This is proposed as a residential property and should be judged as such, with the same standards as imposed on residential properties.

Pages 104-5: Blockage of Views-3the impact is considered less than significant Comment: I disagree that the blockage of views is insignificant. While the mountain peaks would still be visible above the new structure this project will partially but significantly block views of the base of the mountain from a number of vantage points.

Page 122 impact HA-1: The project will increase the need for affordable housing. Comment: The County lists four ways to address affordable housing in a preferential order. The payment of an in lieu fee is the least desired preference. Hasn tour Planning Department seen by now that these in lieu fees have not addressed the affordable housing issue even remotely? Look next door at the Village at Squaw Valley for example. Given our knowledge and experience to date it is criminal to approve the least desirable and proven loosing strategy. Affordable housing is considered by most people up here as the largest need in the north Tahoe community, and the Planning Department should be responsive to this need. Require a more stringent mitigation!

Thank you in advance for paying attention to my comments.

FI-1

FI-2

FI-3

FI-4

FI-5

Yours truly,

-- Fred Ilfeld, Jr. P.O. Box 2160, Olympic Valley, CA 96146 H-(530)583-9505, Cell-(530)448-6060, Fax-(530)583-6157 ilfeldsonthemountain@hotmail.com

## **RESPONSE COMMENTS**

## Fred Ilfeld Jr.

Response FI-1

Comment noted. Photo simulations and architectural elevations are in the preliminary design phase. The project architect has indicated that the exterior fenestration has not yet been designed. See also SVTCA-2.

Response FI-2

See response SVTCA-2, SVTCA-3 and SVTCA-6.

Response FI-3

Comment noted. See responses HSB-8, SVTCA-3, SVTCA-7, and GPM-7.

Response FI-4

Comment noted. Refer to response WS-1.

Response FI-5

Comment noted. See response T-1 and T-2.

May 31, 2004

Pamela Rocca PO Box 3766 Olympic Valley, CA 96146 530-583-6040

Mr. Mike Wells Senior Planner, Placer County Planning Dept. 11414 "B" Ave. Auburn, CA 95603

Re: Comment on the Plumpjack Draft EIR

Dear Mr. Wells, I am a full time Squaw Valley resident and homeowner. We built our home here in 1959.

GARBAGE

There is no mention in the draft on how Plumpjack is going to deal with garbage storage and disposal. I had several discussions with Karen Kelly, former general manager of Plumpjack's, about the garbage storage problem. Plumpjack dumpsters have been in violation of Placer County Code, Chapter 8.16 "Prevention of Bear Access to Garbage" by attracting bears and other wildlife for many years now. During the NOP for the EIR, I was told that Plumpjack intended to install a self-contained garbage compactor system similar to what the Squaw Valley Lodge has now. Whether on not this project goes forward, this compactor system needs to be installed.

## WATER

I am very concerned with any developer having a well that draws water before it reaches the "well field" of our aquifer, run by our two Valley water suppliers. I am especially concerned that the well is in close proximity to Squaw Valley Creek. I understand this irrigation well's testing shows the quality is adequate for drinking. I am aware that tests included in the Draft EIR shows some creek and aquifer interaction. I believe more testing needs to be done. The dates of the testing were done when the water table was high, during the spring. Testing was not done during low aquifer levels and creek flows of late summer and fall. This year is going to be another drought year. The Squaw Valley Public District is continuing a creek and well interaction study and I would like to see the results of this study completed before any project is approved by Placer County. Using Intrawest's water study was inappropriate. It was based on old and inaccurate information.

## **CULTURAL / INDIAN ARTIFACTS**

The EIR states that during excavation of the site, it is anticipated the location of any cultural discoveries would most likely be found near, where the creek is now. It is a fact that Squaw Creek ran through the middle of the site prior to the 1960 Olympics. The creek was diverted and the original creek channel was filled. I believe the entire site should be treated equally in respect to safeguarding any Indian artifacts.

PR-3

HEIGHT OF STRUCTURE

The height of the building is too high. It is a story higher than I remember in earlier discussions and the NOP. I am concerned about the loss of view from pedestrians and surrounding residents.

Thank you for the opportunity to comment on this draft EIR for the proposed Plumpjack expansion.

## **RESPONSE COMMENTS**

#### Pamela Rocca

## Response PR-1

Refer to the third paragraph under Effects Considered to be Less than Significant on page 148 of the DEIR for discussion of solid waste disposal and states that the use of bear resistant containers is proposed.

## Response PR-2

Comment noted. Please see response HSB-11, JC-1, and SVPS-25. The model-simulated impact from pumping 142 gallons per minute (gpm) for three years on flow rates in Squaw Creek is 1,000 gpd or approximately 5 gpm. The stream flow data now being collected by the SVPSD will be used in the more extensive analysis.

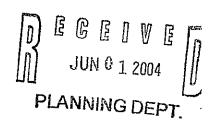
## Response PR-3

Comment noted. Mitigation measures have been included in the EIR that require monitoring of the most culturally-sensitive areas during grading. If resources are encountered during grading, the contractor is required to stop work and notify the County.

## Response PR-4

Comment noted. See responses to HSB-2 and WS-1.

Michael Wells. Senior Planner PCPD 5/27/04



Dear Mr. Wells.

In reviewing the PlumpJack Expansion DEIR I have noted certain statements that have created confusion, at least for me, regarding the impact that pumping by the proposed well will have on the streamflow in Squaw Creek.

JC-1

A first statement from page 129 of the main body of the report is provided below.

Simulated impacts to flows in Squaw Creek were minimal even under a continuous IW pumping rate of 142 gpm for three years. The maximum decrease in flow in Squaw Creek was estimated to be 0.01 cubic feet per second or 5gpm. This decrease is considered immeasurable. This report is attached as Appendix G.

These stimulated creek flow impact studies were conducted by Derek Williams and are discussed in his report that is contained in Appendix G. An extract from page 13 of his report is provided below.

## 4.2.3 STREAM FLOW RESULTS

Pumping the Plumpjack well may impact flows in Squaw Creek. The degree of impact appears to be small, as shown in Figure 13. This figure graphs the simulated Squaw Creek flow for the base case and all three pumping simulations. The differences in creek flow are too small to be noticeable at this scale. While the simulated stream losses can be on the order of 1000 ft<sup>3</sup>/day, this is indistinguishable at the scale of Figure 13. This may, however, be an important change in stream flows during summer and autumn months, when the stream flows are the lowest.

We should note that the simulated stream flows are estimates, and accurate stream flow data is only now being collected. As these stream data become available they will be incorporated into the model to improve model accuracy.

Of particular interest in this extract is that the simulated stream flows are estimates and that accurate streamflow data is only now being collected. I haven't been unable to contact Mr. Williams to ask him if he now has better data that could be incorporated into the DEIR.

I respectfully suggest that the EIR be required to provide actual data, not estimates, on this subject.

Sincerely

John Chisholm

P.O.Box 2122 Olympic Valley Ca. 96146 1 US

## **RESPONSE COMMENTS**

## John Chisholm

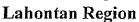
Response JC-1

Comment noted. Please see response SVPS-27 and SVPS-20. The model-simulated impact of pumping 10 gpm to supply the needs of the PlumpJack expansion project will result in less impact to Squaw Creek flows than from pumping 142 gpm. Project changes in flow of Squaw Creek due to pumping a new well will be estimated based on the best available data. The stream flow data now being collected will improve model accuracy.

Letter 13. Lahontan Regional Water Quality Control Board; Scott Ferguson



# California Regional Water Quality Control Board



Terry Tamminen
Secretary for
Environmental
Protection

2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150 (530) 542-5400 \* Fax (530) 544-2271 http://www.swrcb.ca.gov/rwqcb6

Arnold Schwarzenegger Governor

# **MEMORANDUM**

TO:

Scott Morgan

State Clearinghouse 1400 Tenth Street Sacramento, CA 95814

FROM:

Scott C. Ferguson, B.

Chief, Northern Watersheds Unit

DEGELAE

JUN 0 1, 2004

PLANNING DEPT.

DATE:

May 28, 2004

SUBJECT:

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

QUESTIONNAIRE FOR THE PLUMPJACK SQUAW VALLEY INN EXPANSION PROJECT, OLYMPIC VALLEY – PLACER COUNTY ASSESSORS PARCEL NO. 96-02-23, STATE CLEARINGHOUSE NO.

2001122074

Thank you for providing us the opportunity to comment on Draft Environmental Impact Report (DEIR) for the above-mentioned project. The Regional Board understands the project consists of constructing a 152,179 square foot building on a 3.2-acre site located at 1920 Squaw Valley Road in Olympic Valley. The existing area for which the building is proposed is a paved parking lot with landscaping and basketball courts. The proposed building will directly abut an existing 20-foot public utility easement, and the easement/sewer line will be relocated to Squaw Peak Road. The project will involve removing existing stormwater runoff basins and appropriately replacing them. Fifty percent of the site is currently covered with impervious surfaces, and the proposed project will result in a total of 64.6% of impervious surface coverage at the site. Additional improvements noted in the DEIR include underground and surface parking, bank stabilization along a portion of Squaw Creek (grading slope to pre-existing condition and revegetation), landscaping, and pedestrian walkways.

Regional Board staff commented on the initial questionnaire on March 14, 2001, and staff commented on the environmental impact questionnaire on August 27, 2001. Our January 14, 2002 comments on the notice of preparation of an EIR for the project indicated that we were still concerned with previous issues we had raised. We have the following specific comments on the DEIR:

- 1. Part of the project description includes the construction of a centralized storm water detention basin. This is an acceptable alternative for mitigating potential adverse water quality impacts from storm water runoff. However, we encourage the project proponent to use Low Impact Development (LID) principles, the goals of which are maintaining a landscape functionally RWQCB-1 equivalent to predevelopment hydrologic conditions and minimizing the generation of nonpoint source pollutants. LID results in less surface runoff and less pollution routed to receiving waters. Such techniques could include:
  - A. Individual storm water cisterns to collect roof runoff. Not only would this avoid the cost and maintenance of roof drip lines, the water could be used for landscape irrigation thereby conserving water resources.
  - B. Construct "Zero Discharge" areas throughout the project. These can include wet ponds, detention ponds, infiltration areas, grassy swales, and/or rain gardens between the road surfaces and sidewalks. Effective use of these devices can, potentially, entirely eliminate the need for storm water collection conveyances, drop inlets, and infiltration basins.
  - C. Use pavement surfaces for driveways, roads, and sidewalks that have a lower runoff coefficient. Such surfaces include pervious concrete, pervious asphalt, cobbles, turf block, grass or gravel over porous plastic, brick without grout, etc.

LID development practices that would maintain aquatic values could also reduce local infrastructure requirements and could benefit energy conservation, air quality, open space, and habitat. Many planning tools exist to implement the above principles, and a number of recent reports and manuals provide specific guidance regarding LID. Additional resource information may be obtained from the Low Impact Development Center's website, located at <a href="https://www.lid-stormwater.net">www.lid-stormwater.net</a>.

2. Section 2.4 discusses various regulatory requirements. It is stated that the project, "...will work under a General permit No. CAG616002 – Discharges of Storm Water Runoff
Associated with Construction Activity Involving Land Disturbance in the Lake Tahoe
Hydrologic Unit." This project is not in the Lake Tahoe Hydrologic Unit, and the referenced permit is not applicable to this project. Instead, the applicant may need to comply with State Water Resources Control Board (SWRCB) Order No. 99-08-DWQ, National Pollutant Discharge Elimination System General Permit No. CAS000002, establishing a statewide general permit for discharges of storm water runoff associated with construction activity. The SWRCB is currently updating the permit.

This section also states that a Storm Water Pollution Prevention Plan (SWPPP) will be submitted to the Lahontan Regional Water Quality Control Board (Regional Board) for review, comment, and approval. Please note that the current statewide general construction permit does not require Regional Board approval of a SWPPP prior to the commencement of construction activities. Any such mitigation measure that relies on this approval should be removed from the final EIR.



This section further states that a 401 Water Quality Certification will be required for all work within the 100-year flood plain. It should be clarified in this section that such certification is only required for those specific areas considered jurisdictional by the US Army Corps of Engineers and where a permit is issued pursuant to Section 404 of the Clean Water Act (the regulatory procedure is correctly cited in Section 3.4.1). It should be further clarified that the Regional Board's Water Quality Control Plan for the Lahontan Region (Basin Plan) prohibits any discharge/disturbance within the 100-year flood plain of the Truckee River or its tributaries, unless such activity qualifies for an exemption. The applicant will need to apply for and obtain such an exemption from the Regional Board (exemption criteria is enclosed). The final EIR shall include adequate information to make the necessary findings for the exemption.

Action Needed: Correct all permit references in final EIR as noted above. Correct all SWPPP references in the final EIR as noted above. Provide adequate information in the final EIR necessary for the Regional Board to make the 100-year flood plain exemption findings. (Also, See Comment No. 7 below regarding mitigation measure No. FC-1a.)

3. Section 2.5 provides a summary of required permits and approvals. The need to obtain an exemption to the Regional Board's Basin Plan prohibition for discharges within the 100-year RWQCB-3 flood plain of the Truckee River or any of its tributaries has been omitted.

Action Needed: Include the need to apply to, and obtain from, the Regional Board for this exemption.

4. Impact Nos. GEO-2, FC-2, and FC-3 indicate the possibility (albeit, small) of intercepting ground water while excavating the parking garage. The mitigation for this impact includes a RWQCB-4 subsurface perimeter drainage system to collect and direct water away from basement walls and foundations. Please note that SWRCB Water Quality Order No. 2003-0003-DWQ regulates such discharges to land. Also, the Regional Board adopted Order No. R6T-2003-0034 establishes permitting requirements for limited threat discharges to surface waters. This permit also requires a compliance demonstration with the California Toxics Rule.

<u>Action Needed:</u> Identify the discharge point of dewatering discharges in the final EIR. Provide adequate information to demonstrate that the applicable permit conditions will be satisfied.

5. Mitigation Measures No's. GEO-4c, d, and e mention the use temporary BMPs and stabilization measures to mitigate the impact of site grading activities. However, the mitigation measures are very general and provide no substance as to what specifically will be implemented to protect water quality. For example, GEO-4e states that all bare dirt areas will be permanently stabilized. How will this be done? Will geo-mats be used, will the site be mulched, or will the site be completely revegetated? What kind of monitoring will be in place to evaluate the effectiveness of the selected option?

Action Needed: Provide adequate detail in the final EIR on the selection of temporary BMPs

and stabilization measures. Information shall be provided to indicate why the selected methods were chosen over other alternatives.

6. Section 3.3.1 references a Flood Insurance Rate Map panel to demonstrate that the project site is not within a designated flood zone. However, that map is neither useful nor accurate to determine the extent of the 100-year flood plain of Squaw Creek through the project property boundaries. Such determinations are typically the result of a hydrological evaluation of the contributing watershed in combination with an on-site evaluation. It does not appear that such an analysis has been conducted to determine the extent of the flood plain on the project property site. Such a determination is necessary to fully evaluate the extent of any proposed impacts within the flood plain (such as the proposed stream bank stabilization activities).

Action Needed: Conduct the necessary hydrological evaluation to generate a site-specific 100-year flood plain map of Squaw Creek along the project site and include a copy of the map and supporting information in the final EIR.

7. Mitigation Measure No. FC-1a states that all proposed disturbances within the 100-year flood plain are restorative in nature. It is noted in the discussion for Impact FC-1 that the,

"...restored, new or enlarged floodplain will be of sufficient area, volume, and wetland value to more than offset the flood flow attenuation capacity, surface flow treatment capacity and ground water flow treatment capacity lost by construction of this aspect of the project."

However, there is no information provided to identify the extent of flood plain activity, existing function and values, projected functions and values that will be restored, and monitoring to verify restoration goals.

Action Needed: The final EIR shall identify and quantify the extent of proposed flood plain disturbance, the existing functions and values that will be impacted by the disturbance, and the functions and values that will be restored. The final EIR shall identify a monitoring program and applicable success criteria that will be implemented to ensure a successful restoration effort. The information provided under section 3.4.3 (page 67) describes quite a bit of existing background functions and values that could be incorporated into success criteria.

8. The discussion regarding Impact No. FC-2 states that a final drainage report will be prepared RWQCB-8 as part of the final project design. This report should be included in the final EIR in order to assess the potential for water quality impacts from storm water runoff and from flood flows.

Action Needed: Include the drainage analysis in the final EIR.

9. Section 3.3.4, "Level of Significance After Mitigation", states that the project, "...will require a permit and inspection from the Lahontan Regional Water Quality Control Board and the Placer County Department of Public Works." It is inappropriate to rely on any agency's permitting requirements to mitigate potential water quality related impacts, unless such permits already exist which prescribe the required mitigation. Regulations, policies, and

procedures are all subject to change, which may then impact an agency's depth of regulatory oversight. Further, Regional Board inspection efforts are limited by budget constraints and should not be relied upon as a tool to monitor the site for compliance with the required mitigation measures.

Action Needed: The final EIR shall delete any reference to other agency's permitting and compliance programs as a means of establishing mitigation measures and as a means of ensuring compliance with required mitigation measures. Other effective measures for ensuring appropriate mitigation and compliance with the required mitigation must be identified in the final EIR.

10. Mitigation Measure No. AQ-2 requires twice daily watering of disturbed surfaces to minimize fugitive dust emissions. Depending upon the season and weather conditions, twice-daily watering may be entirely inadequate. Further, the source of the water for controlling fugitive dust is often treated wastewater. Depending upon the source of the water, constituents including Total Dissolved Solids, nutrients, and Chlorine residual may be of concern with respect to runoff into Squaw Creek or infiltration into the community aquifer (a sole-source aquifer for drinking water supply).

<u>Action Needed:</u> Identify the need for additional watering dependent upon site-specific conditions, and identify the source of water used to control fugitive dust emissions in the final EIR.

11. In Appendix A, the response to comments from the Regional Board states:

RWQCB-11

"The EIR will also include the location and tentative design of the BMPs for the drainage pipes/stormwater filtration facilities, as well as how these facilities will be designed to comply with the Truckee River Hydrologic Unit Project Guidelines for Erosion Control. The EIR will demonstrate how compliance with the water quality objectives will be achieved."

This information was not provided in the DEIR. Further, the referenced guidelines have been re-named *Lahontan Region Project Guidelines for Erosion Control*. A copy is enclosed for future reference.

Action Needed: Include this information in the final EIR.

12. In accordance with the requirements of the California Environmental Quality Act, the final EIR should include an appropriate monitoring program for all proposed mitigation measures. The monitoring program should be designed to assess the adequacy of any installed mitigation measures over time.

Action Needed: Include an appropriate mitigation monitoring program in the final EIR for all water quality related mitigation measures.

Please contact Eric J. Taxer at (530) 542-5434, or me at (530) 542-5432, if you have any questions regarding this matter or if I can provide any additional information.

Enclosures: State Clearinghouse Form A

100-year flood plain exemption criteria

Lahontan Region Project Guidelines for Erosion Control

cc: Lori Lawrence, Placer County Planning Department

Hilary Newsom, PlumpJack Development Fund

Suzanne Larson, K.B. Foster Civil Engineering, Inc.

LSA Associates, Inc

Tom Cavanaugh, US Army Corps of Engineers, Sacramento District, Regulatory Branch

## RESPONSE COMMENTS

## Regional Water Quality Control Board, Lahontan Region

#### RWOCB -1

It is noted that "Low Impact Development (LID) goals are to maintain a landscape functionally equivalent to predevelopment hydrologic conditions and minimize the generation of non-point source pollutants. Implementation of LID principles may result in the reduction or elimination of the proposed stormwater detention basin.

Mitigation measure WQ-2K has been added to the document which states, "Low Impact Development (LID) principles will be incorporated into the final design of the project to the extent feasible."

## RWQCB-2

Comment noted. The language has been changed from, "If approved the project will work under a General permit No. CAG616002-Discharges of Storm Water Runoff Associated with Construction Activity Involving Land Disturbance in the Lake Tahoe Hydrologic Unit" to "If approved, the applicant may need to comply with State Water Resources Control Board (SWRCB) Order No. 99-08-DWQ National Pollutant Discharge Elimination System General Permit No. CAS000002. This general permit establishes a statewide general permit for discharges of stormwater runoff associated with construction activity."

The following language has been added to Section 2.4. "The current statewide general construction permit does not require Regional Board approval of the SWPPP prior to the commencement of construction activities." The submittal of a SWPPP was not included as a mitigation measure.

According to Chapter 4.1 of the Water Quality Control Plan for the Lahontan Region, The Regional Board may grant exemptions to prohibition 4(c) "The discharge or threatened discharge, attributable to human activities, of solid or liquid waste materials including soil, silt, clay, sand, and other organic and earthen materials to lands within the 100-year floodplain of the Little Truckee River or any tributary to the Little Truckee River is prohibited." The Regional Board may grant this exemption for certain types of projects. The proposed project falls under the following category, "projects solely intended to reduce or mitigate existing sources of erosion or water pollution, or to restore the functional value to previously disturbed floodplain areas." An exemption to prohibition 4 (c) may be allowed only when all of the following findings are made:

- The project is included in one or more of the five categories listed above *This project qualifies under category 1 as listed above.*
- There is no reasonable alternative to locating the project or portions of the project within the 100year floodplain.
  - The project proposes restoration of a portion of the creek. By its very nature, the project must occur in the 100-year floodplain.
- The project, by its very nature, must be located within the 100-year floodplain.

  The project proposes restoration of a portion of the creek. By its very nature, the project must occur in the 100-year floodplain.

• The project incorporates measures which insure that any erosion and surface runoff problems caused by the project are mitigated to levels of insignificance.

The final project design will incorporate mitigation measures so that runoff problems caused by the project are mitigated to levels of insignificance. The following mitigation measures are included as BR-1.

- 1. Disturbance to the bank of Squaw Creek will be minimized to the maximum extent possible.
- 2. Construction activities associated with the bank stabilization will be conducted between May 1 and October 15. This window may be adjusted based on current weather patterns at the time of construction (e.g., late season rainfall could postpone the start date, etc.).
- 3. No work will be conducted within the live stream of Squaw Creek.
- 4. Standard BMPs will be implemented during construction to avoid and minimize erosion and siltation into Squaw Creek.
- 5. Permits will be obtained from the Corps, RWQCB, and CDFG prior to a grading permit being issued for the project.
- The project will not, individually or cumulatively with other projects, directly or indirectly, degrade water quality or impair beneficial uses of water.
  - Maintenance and repair of the creek will not degrade water quality.
- The project will not reduce the flood flow attenuation capability, the surface flow treatment capacity, or the ground water flow treatment capacity from existing conditions. This shall be ensured by restoration previously disturbed areas within the 100-year floodplain within the project site, or by enlargement of the flood plain within or as close as practical to the project site. The restored, new or enlarged floodplain shall be of sufficient area, volume and wetland value to more than offset the flood flow attenuation capacity, surface flow treatment capacity and ground water flow treatment capacity lost by construction of the project. This finding will not be required for: (1) essential public health or safety projects, (2) projects to provide essential public services for which the Regional Board finds such mitigation measures to be infeasible because the financial resources of the entity proposing the project are severely limited, or (3) projects for which the Regional Board finds (based on evidence presented by the proposed discharger) that the project will not reduce the flood flow attenuation capacity, the surface flow treatment capacity, or the ground water flow treatment capacity from existing conditions. Also see Appendix B for copies of Orders 6-90-22 and 6-93-08 describing conditions under which the Executive Officer can grant exceptions.

The work within the 100-year floodplain is for restoration purposes only. This will not reduce the flood flow attenuation capability, the surface flow treatment capacity, or the ground water flow treatment capacity from existing conditions. This work is considered restoration of a previously disturbed area within the 100-year floodplain within the project site. This portion of Squaw Creek was damaged during the floods of 1997.

- The project will not, individually or cumulatively with other projects, directly or indirectly, degrade water quality or impair beneficial uses of water.
  - Maintenance and repair of the creek will not degrade water quality.
- The project will not reduce the flood flow attenuation capability, the surface flow treatment capacity, or the ground water flow treatment capacity from existing conditions. This shall be

ensured by restoration previously disturbed areas within the 100-year floodplain within the project site, or by enlargement of the flood plain within or as close as practical to the project site. The restored, new or enlarged floodplain shall be of sufficient area, volume and wetland value to more than offset the flood flow attenuation capacity, surface flow treatment capacity and ground water flow treatment capacity lost by construction of the project. This finding will not be required for: (1) essential public health or safety projects, (2) projects to provide essential public services for which the Regional Board finds such mitigation measures to be infeasible because the financial resources of the entity proposing the project are severely limited, or (3) projects for which the Regional Board finds (based on evidence presented by the proposed discharger) that the project will not reduce the flood flow attenuation capacity, the surface flow treatment capacity, or the ground water flow treatment capacity from existing conditions. Also see Appendix B for copies of Orders 6-90-22 and 6-93-08 describing conditions under which the Executive Officer can grant exceptions.

The work within the 100-year floodplain is for restoration purposes only. This will not reduce the flood flow attenuation capability, the surface flow treatment capacity, or the ground water flow treatment capacity from existing conditions. This work is considered restoration of a previously disturbed area within the 100-year floodplain within the project site. This portion of Squaw Creek was damaged during the floods of 1997.

#### RWOCB-3

Comment noted. The following language has been added to item 3 of Section 2.5, "c. Apply to and obtain an exemption to the Regional Board's Basin Plan 100-year floodplain discharge prohibition"

## RWQCB-4

The discharge from the subsurface perimeter drainage system will either be discharged to an on site basin or into pretreatment tank prior to discharge into the sanitary sewer. The rate of discharge will limited to an amount that does not cause the basin to overflow if a basin is used. If a pretreatment tank and discharge to the sanitary sewer is used the flow will be monitored to insure that it does not exceed the sanitary sewer system capacity or violate discharge requirements for discharge into the sanitary sewer system. The discharge will comply with the requirements of SWRCB Water Quality Order No. 2003-0003-DWQ and Regional Board Order No. R6T-2003-0034 as well as the California Toxics Rule.

#### RWOCB-5

Mitigation measures WQ-1a, WQ-1b, WQ-1c, WQ-1d, WQ-2, WQ-2a, WQ-2b, WQ-2c, WQ-2d, WQ-2e, WQ-2f, WQ-2g, WQ-2h, WQ-2i, and WQ-2j provide adequate detail for the selection of Temporary BMPs and stabilization measures.

## RWQCB-6

Portions of the stream bank stabilization work will be in the 100-year floodplain of Squaw Creek. This proposed work is limited to stabilization of the unstable portions of he streambank. All other proposed improvements are outside the 100-year floodplain. Therefore, a 100-year hydrological evaluation and preparation of a site specific flood plain map of Squaw Creek along the project site should not be required at this time. A 100-year hydrological evaluation and preparation of a site

specific flood plain map of Squaw Creek along the project site will be conducted during final design of the project.

## RWQCB-7

Floodplain disturbance will limited to stabilization of the unstable portions of he streambank. Only the portions of the streambank that have eroded and become unstable will be disturbed. The proposed disturbance will be limited to re-establishing the contour and vegetation of the streambank to its pre-existing condition before it eroded during the last flood. Monitoring will consist of visual observation of the restored portions of the streambank. If the visual monitoring indicates that vegetation is not establishing, retreatment will be applied if necessary.

## **RWQCB-8**

It is not necessary to include the final drainage analysis in the final EIR to determine the level of significance of potential water quality impacts and mitigations measures necessary to mitigate those impacts. The discussion of water quality impacts and mitigations measures on pages 52, 53, 54, and 55 in the Draft EIR provide adequate detail and information on water quality impacts and mitigation measures necessary to make the finding that impacts are reduced to less than significant with the proposed mitigation measures. No text change was required.

#### RWOCB-9

The preparation of the site specific drainage report; erosion control plan; Lahontan Regional Water Quality Control Board permit and inspection; and Placer County Department of Public Works permit and inspection are not mitigation measures. Mitigation measures WQ-1a, WQ-1b, WQ-1c, WQ-1d, WQ-2, WQ-2a, WQ-2b, WQ-2c, WQ-2d, WQ-2e, WQ-2f, WQ-2g, WQ-2h, WQ-2i, and WQ-2j are the proposed mitigation measures that will reduce impacts to less than significant levels.

The only mitigation measure that refers to RWQCB approval is Mitigation Measure BR-1 which includes item 5 as an item to be considered. A Lahontan permit is required prior to Placer County issuance of the grading permit, so this reference has not been removed. Impact BR-1 is mitigated to a less than significant level with mitigations one through four. No text change was required.

#### RWOCB-10

Comment noted. The language of Mitigation measure AQ-2 has been changed from "Twice daily watering of disturbed surfaces to minimize fugitive dust and proper maintenance of construction vehicles and equipment to comply with PCAPCD Rule 228." to "Twice daily (or more often depending on site specific conditions) watering of disturbed surfaces to minimize fugitive dust and proper maintenance of construction vehicles and equipment to comply with PCAPCD Rule 228. Water used for watering shall not contain constituents that may be harmful in runoff to Squaw Creek or infiltration into the community aquifer. The community aquifer is the sole source aquifer for drinking water supply."

#### RWQCB-11

It is not necessary to include the location and tentative design of the BMPs for the drainage pipes/stormwater filtration facilities in the EIR to determine the level of significance of potential water quality impacts and mitigations measures necessary to mitigate those impacts. The discussion

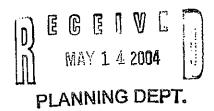
of water quality impacts and mitigations measures for FC-2, WQ-1 and WQ-2 in the Draft EIR provide adequate detail and information on water quality impacts and mitigation measures necessary to make the finding that impacts are reduced to less than significant with the proposed mitigation measures. During final design these facilities will be designed to comply with the Lahontan Region Project Guidelines for Erosion Control. No text change is required.

## RWQCB-12

Comment noted. The lead agency is responsible for ensuring that mitigation measures are implemented as appropriate. The monitoring of these mitigation measures will be at the discretion of the County. The following language has been added to the Environmental Review Process in Section 1.2, Environmental Procedures. "In the event that the County approves the proposed project, written findings of fact will be prepared and adopted in which Placer County identifies all significant effects and adopts mitigation measures."

May 12, 2004

Michael Wells, Senior Planner Placer County Planning Department 11414 B Avenue Auburn, CA 95603



Dear Mr. Wells,

I have been an owner of a condominium at the Squaw Valley Lodge since 1988, and I am writing to express my deepest concern about the scale of the proposed expansion of the PlumpJack Squaw Valley Inn.

I am very disturbed that the six stories planned for this new addition will be higher than any other buildings in this very residential neighborhood. Indeed, the lodge has only three (really four) floors. In addition, the building as proposed will seriously affect the mountain views of many owners of adjacent properties, and will meaningfully diminish their access to sunlight which is so important, especially in the winter, the period of maximum usage.

JS-1

In addition, I understand that the bulk of the building is of concern. I have not seen the plans and cannot go to the Tahoe City Public Library, but it seems to me that all other developments in this neighborhood have approved to be in approximately the same scale. If the scale of the new, proposed structure is larger, then that too is a major problem which needs to be addressed.

I hope that these concerns will be considered when the project is reviewed for approval, and that the owners will be required to reduce the scale, the height, and the scope of the new building so that it is not so injurious to the neighborhood, and to the environment.

Sincerely

Jack Schafer

Suite 500
San Francisco
California 94108
TEL 415 981 8288
FAX 415 981 8229
EMAIL jackschafer@att.net

49 Geary Street

930 Talls 65 (110 mm mile)

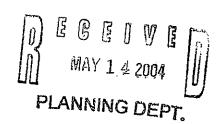
Retail Management Consultants

# **Jack Shafer**

Response JS-1

Comment noted. See response GPM-9, SVTCA-9, and MWE-1.

Daniel B. Hrdy, M.D. 21440 Road 87 Winters, CA 95694 530-661-9225 530-661-3633 Fax



May 13, 2004

Michael Wells, Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603

Re: Plumpjack Squaw Valley Inn Expansion Project

Dear Mr. Wells,

I am writing to object to the proposed Plumpjack Squaw Valley Inn Expansion Project. The project's six floor building is completely out of scale with nearby buildings. The presence of such a tower would significantly visually impact the area. If they are given approval for this inappropriately large project, they should reconfigure the project to no more than three stories.

DH-1

Sincerely,

Day 43. Harry

Daniel B. Hrdy, M.D.

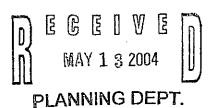
Daniel B. Hrdy, M.D.

Response DH-1

Comment noted. See response GPM-9, SVTCA-9, and MWE-1.

May 11, 2004

Michael Wells Senior Planner Placer County Planning Department 11414 "B Avenue Auburn, CA 95603



RE: PLUMPJACK SQUAW VALLEY INN EXPANSION PROJECT OLYMPIC VALLEY, CA

Dear Mr. Wells,

This letter is in regard to the proposed PlumpJack Expansion Development on Squaw Peak Road. As an owner of property in Olympic Valley and a user of the wonderful facilities, I am not opposed to the further development of properties within the valley. This includes the Intrawest and PlumpJack Expansion.

The negative issue about this development that I must address is its height. In an area of the valley that consist of two and 3 story buildings, a six-story building is out of place and will unfairly take existing views from property owners. This development should be limited to three stories.

KO-1

An example of the reciprocal respect that was given to the existing PlumpJack facility, is that the new Squaw Valley Lodge building across the street from PlumbJack is limited to three stories which nicely preserves the PlumpJack views of the southern valley slopes. I believe and would expect PlumpJack should respect the views of the northern slopes for the neighbors. This is a significant impact to the valley and neighborhood and should be mitigated with a requirement that limits this development to three stories.

Very truly yours

Ken N. Olcott

201 Squaw Peak Road, Unit 323

Olympic Valley, CA 96146

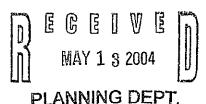
# Ken N. Olcott

Response KO-1

Comment noted. See response GPM-9, SVTCA-2, SVTCA-3, and MWE-4.

May 11, 2004

Michael Wells Senior Planner Placer County Planning Department 11414 "B Avenue Auburn, CA 95603



RE: PLUMPJACK SQUAW VALLEY INN EXPANSION PROJECT OLYMPIC VALLEY, CA

Dear Mr. Wells,

This letter is in regard to the proposed PlumpJack Expansion Development on Squaw Peak Road. As an owner of property in Olympic Valley and a user of the wonderful facilities, I am not opposed to the further development of properties within the valley. This includes the Intrawest and PlumpJack Expansion.

The negative issue about this development that I must address is its height. In an area of the valley that consist of two and 3 story buildings, a six-story building is out of place and will unfairly take existing views from property owners. This development should be limited to three stories.

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Very truly yours

Werner Goese

201 Squaw Peak Road, Unit 323

development to three stories.

Olympic Valley, CA 96146

WG-1

# Werner Goese

Response WG-1

Comment noted. See response GPM-9, SVTCA-2, SVTCA-3, and MWE-4.

John and Sue Barnhart 8916 Roscomare Ct. Elk Grove, CA. 95624 barnhart@cwia.com (916) 685-1619

DEGETVED MAY 1 7 2004 PLANNING DEPT.

May 12, 2004

Mr. Michael Wells Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA. 95603

RE: PlumpJack Squaw Valley Inn Expansion Project (EIAQ-3598)

Dear Michael,

The above referenced project should be limited to 3 stories in height vs the proposed 6 stories. Other projects in Squaw Valley are limited to 3 stories with the exception of the Resort at Squaw Creek which is in an isolated location and imbedded in a stand of tall trees. Views are one of the key resources in the Squaw Valley area that need to be preserved. A 6 story project would be visible from everywhere in the west end of Squaw Valley and have a significant negative impact on views that could not be satisfactorily mitigated. The Plumpjack project is in the middle of an existing neighborhood and should conform with the norms established by the mostly built out surrounding properties. Thank you for your consideration.

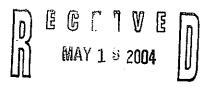
Sincerely,

John A. Barnhart

201 Squaw Peak Road Unit 352 Olympic Valley, CA. 96146 JB-1

# John A. Barnhart

Response JB-1 Comment noted. See response MWE-2, MWE-3 and GPM-9.



PLANNING DEPT.

Donald E. Smith Squaw Valley Lodge #237 201 Squaw Peak Road Olympic Valley, CA 96146 May 11, 2004

DS-1

Mr. Michael Wells Placer County Planning Department 11414 B Ave. Auburn, CA 95603

Dear Mr. Wells,

I would like to express my concerns about the PlumpJack Squaw Valley Inn Expansion Project at 1970 Squaw Valley Road, Olympic Valley, CA (APN 096-020-023).

As I understand it, this project as proposed would put a large six story building at this site. This would negatively impact the surrounding area, which has buildings which are set back from the street and are only two or three stories tall. In particular, it would affect the quality of living at my vacation condominium which is directly across the street on the second floor of a three story building. I also estimate it would reduce the value of my property by tens of thousands of dollars.

I think a three story development should be the maximum for this area. That should still allow for views of the mountains in the background even from street level, which is the main feature and attraction of the area.

Sincerely,

Donald E. Smith

home address: 2814 Hillegass Ave. #C3 Berkeley, CA 94705

# **Donald E. Smith**

Response DS-1 Comment noted. See response MWE-3 and WS-1.

Todd Elmgren c/o Squaw Valley Lodge Unit 325 Olympic Valley, California 96146

May 18, 2004

MAY 2 0 2004

PLANNING DEPT

Michael Wells, Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, California 95603

Subject: Plump Jack's Squaw Valley Inn Expansion

Dear Mr. Wells:

I own condominium #325 at Squaw Valley which faces the street. My view will be obstructed by the construction of a 6-story building. I feel the height is out of place with the surrounding environment and should not be allowed. Although I would prefer no building, a smaller 2 or 3-story building would be more in keeping with the area.

TE-1

Thank you for considering my input.

Todd Eluque

Sincerely,

Todd Elmgren

(510) 433-8946

TE/jm

# **Todd Elmgren**

Response TE-1

Comment noted. See response SVTCA-2, SVTCA-3 and WS-1.

Donald Druyanoff c/o Squaw Valley Lodge Unit 513 Olympic Valley, CA 96146

Michael Wells Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603

Re: Proposed Project: Plums Jack Squaw Valley Inn Expansions

Dear Mr. Wells:

I own a Condominium in the Squaw Valley Lodge. My entire view will obstructed by this 6-story building. I strongly object to that high building. The maximum should be 2 to 3 stories just like all the surrounding buildings. A building that tall will stick out like a sore thumb and ruin the beauty of the area.

DD-1

If you wish to contact me my work phone number is (408) 481-3616.

Thank you for considering my comments.

Very truly yours,

Donald Druyanoff

MAY 2 0 2004

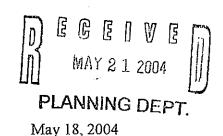
PLANNING DEPT.

# **Donald Druyanoff**

Response DD-1

Comment noted. See response SVTCA-2, SVTCA-3 and WS-1.

# Robert J. Loarie Squaw Valley Lodge, Unit #622 201 Squaw Peak Road Olympic Valley, CA 96146



Mr. Michael Wells Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603

Re: Plumpjack Squaw Valley Inn Expansion Project

Dear Mr. Wells,

While I have been aware for some time the Plumpjack's was planning further development, I have just recently learned the scale of what is being proposed. As the owner of a condominium just across Squaw Peak Road from the proposed expansion, naturally I am quite interested in the specifics.

I consider the current Plumpjack's complex to be very tasteful and a valuable component of the Squaw Valley base area development. I also feel that an appropriate expansion of the complex, within reason, also makes a good deal of sense and that the location can support additional development. I do, however have several major concerns:

I have not actually seen the draft EIR for the expansion, but I understand that a six story addition is proposed. This concerns me greatly as I feel that it is substantially out of scale, both in height and density, with the rest of the development in the immediate vicinity. The new Village is four stories and that is pushing it in my view. A six story addition, is not only totally out of character with the existing Plumpjack complex, but it will block views of the surrounding hills and mountainsides for those of us nearby. The Squaw Valley Lodge complex immediately across the street is two and three stories. Also, the proposed density will undoubtedly create disproportionate traffic and parking issues in the vicinity. Finally, I am aware that the existing water and sewer infrastructure in the valley is already overtaxed and I do not know what plans exist to increase the water and sewer capacity. I am concerned about additional development, particularly high-density development, unless and until that issue has been addressed.

Thank you for your consideration.

Sincerely yours,

Robert J. Loarie

RL-1

RL-2

RL-3

## Robert J. Loarie

## Response RL-1

Comment noted. See response SVTCA-2, SVTCA-3 and WS-1.

## Response RL-2

Comment noted. See response HSB-10 regarding traffic. Parking allocations will be met per County zoning requirements.

## Response RL-3

Comment noted. Refer to comment WS-3 for water and sewer issues.

July 16, 2003

Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603 ATT: Lori Lawrence, Environmental Review Coordinator

re: proposed SV Plumpjack project

Dear Planning Commissioners:

I realize that beauty is in the eye of the beholder. But before considering the Plumpjack expansion project, I would ask that each Planner, Commissioner, Supervisor, and owner of the SV Inn drive the length of Squaw Valley Road from Route 89 to the Inn's parking area on Squaw Peak Road. Along the way, please take note of every bit of landscaping. I think you will find that the current Inn/Plumpjack parking lot is far and away the most attractive landscaped site in the Valley. This beautifully-designed little gem looks more like a park than a parking lot. And the Inn's owners, to their credit, have maintained it over the years in an exemplary manner.

If you agree that there is value in retaining some semblance of the beauty of an area in the center of urban-style development, then I hope that this oasis can be preserved. It is a reminder of how pretty this place was in the past, a view corridor, a breath of fresh air in the midst of congestion, and a model for future landscaping. The latter has increasingly been reduced to sodding the narrow edges of overbuilt sites and planting a few aspen trees.

The proposal calls for replacing this parking area with a massive six-story edifice, bursting at the seams of the property's boundaries. It will engulf us, the closest neighbors, at the east end of the 13-unit Tram Condos building, blocking out the morning sun.

HB-1

As homeowners at the head of the Valley for almost 33 years, we know that since the 1970s the Supervisors intended to make Squaw a destination resort. That has happened. My questions regard the nature and propriety of further development here, and the costs to existing property owners. A commentary on what has occurred in the neighborhood to date will make my point: The SV Lodge expansion cut our view of the mountain by 50% and left us looking directly at a concrete garage structure (which is lit 24 hours a day), a large dumpster, and a canyon of boxed condos. Our immediate environment has thus become more like a city alley than a mountain retreat.

Dense development need not and should not completely decimate the ambience that all come here to enjoy. Sparing this small lot will go a long way toward retaining a modicum of class and openness in an area which has fast become tasteless and confined. If further justification is needed, then consider it reasonable to protect the interests of those who have paid property taxes to Placer County for more years than many "locals" have lived here.

Why not let the Inn expand above its current footprint? Please just spare the parking lot.

Sincerely,

H. Spencer Bloch

# H. Spencer Bloch, M.D.

Response HB-1

Comment noted. See response SVTCA-9, MWE-1 and WS-1.

## HOGAN & ESTHER LEW

201 SQUAW PEAK ROAD, UNIT 148 OLYMPIC VALLEY, CA 96146 HOME: 408 773-9587

May 27, 2004



Placer County Planning Department Attention: Ms. Lori Lawrence, Planning Technician 11414 B Avenue Auburn, CA 95603

Re: PlumpJack Squaw Valley Inn Expansion Project, APN 096-020-023
Publish Date: April 22, 2004, Tahoe World

#### Dear Ms. Lawrence:

I am writing to express our concerns about the PlumpJack Squaw Valley Inn Expansion Project. My husband and I own a condo in Squaw Valley Lodge. We do not have a problem with PlumpJack expanding their facilities; however, we do have major concerns regarding this project.

- (1) Six stories is way too tall and is not consistent with the surrounding buildings like Squaw Valley Lodge and the other condo's or homes located down the road. The new building should be limited to two stories, three stories maximum.
- (2 If they build over their parking lot, the PlumpJack property will have minimal open space, which is a concern.
- (3) With the increased number of units at PlumpJack, will the existing roadway be sufficient to handle the increased traffic?
- (4) What part of the proposed facility will face Squaw Valley Lodge property? Will there be nuisances such as increased noise due to building machinery or delivery entrances, eyesores such as garbage containers, etc.
- (5) What is the appearance of the structure? Is it going to be similar in style to the condos and homes of the neighborhood to maintain that "residential and mountain retreat" look and feel?
- (6) What type of landscaping will surround their facilities and facing Squaw Valley Lodge? Will it be consistent to the neighborhood and not an ugly thing to look at from Squaw Valley Lodge?

My husband and I have spoken to a number of owners, who have also expressed the same concerns about PlumpJack's expansion. Should you need any additional questions or clarification about our concerns, please do not hesitate to contact me at home (408) 773-9587 or cell (408) 218-2099.

Thank you for your time and kind attention to this matter.

Sincerely,

Esther Lew

HEL-2

HEL-1

HEL-4

HEL-3

HEL-5

HEL-6

## **Hogan & Esther Lew**

Response HEL-1

Comment noted. See response SVTCA-2, SVTCA-3 and WS-1.

Response HEL-2

Comment noted. See response MWE-5.

Response HEL-3

Comment noted. See response HSB-10.

Response HEL-4

Comment noted. Refer to response HSB-2.

## Response HEL-5

Comment noted. Page 109 of the EIR states: "The PlumpJack project development will be designed in respect to the regional setting of the area by blending in design aspects of the surrounding facilities into the construction of the proposed project. The new facility will be of the same style and décor as the surrounding community to maintain the small village atmosphere required by the Squaw Valley General Plan." See response HSB-2.

### Response HEL-6

Comment noted. Landscape design will follow the environmental review process, and is associated with the design review approval process.

# CECILIA & JOHN PLOUGH 23 FARM RD. SAN RAFAEL, CA 94903

Office 415-550-0400 Fax 415-826-5303 Home 415-472-3163 Fax 415-4998731

PLANNING DEPT

May 24, 2004

Placer County Planning Department 11414 "B" Avenue Auburn, Ca 95603

Attn: Michael Wells, Senior Planner

Re: Proposed Project: PlumpJack Squaw Valley Inn Expansion Project

Dear Mr. Wells:

I am the owner of 808 Squaw Valley Lodge Condo Plan 99-0081375, fee parcel number 096-640-029-000 for the past four years. For 12 years previously, I was the owner of 332 Squaw Valley Lodge. I have watched the valley change with the building of the Resort at Squaw Creek and Interwest in the village. The village has become a very dense crowded area. In winter the traffic is intense trying to turn onto Squaw Peak Road in front of the existing PlumpJack Inn to get into our property.

I have been in the construction business for 35 years. As a contractor I am in favor of the property owner utilizing his property value for a profitable return. Building a three story building and a remodel would fit in with the street and surrounding units. However, as a property owner I oppose the building of anything over three stories in height due to the increased noise, overpopulating the area, lack of sufficient water and environmental issues.

I plead with the planning department to leave the little bit left of the visual beauty of the valley. Don't make it an urban jungle.

Sincerely,

Cecilia & John Plough

CJP-1

# Cecilia & John Plough

Response CJP-1

Comment noted. See response SVTCA-2, SVTCA-3 and WS-1 aesthetics issues, and WS-3 for water issues. As noted on pages 122-123, the project is consistent with the *Squaw Valley General Plan and Land Use Ordinance* and the population is anticipated, accordingly.

May 25, 2004

To: Michael Wells

Senior Planner

Placer County Planning Department

11414 B Avenue Auburn, CA 95603

(530) 886-3000

MAY 28 2004

PLANNING DEPT.

From: Chris Kocher

2251 Green Street

San Francisco, CA 94123

Re: PlumpJacks Squaw Valley Inn Expansion Project

As an owner of Squaw Valley Lodge Unit 709A and B, I am highly concerned about the environmental impact of the proposed 5-6-story building PlumpJacks wants to erect.

I am writing you because we believe this project should be limited so as not to obstruct the skyline, increase traffic, add more noise and otherwise adversely impact the quality and serenity of the valley. <u>Specifically, we believe the project should be limited to no more than three floors.</u>

CK-1

Also I think that many people are not aware of this and have not had a chance to respond. I only found out a few weeks ago in a letter dated May 4<sup>th</sup> from the Squaw Valley Management team. This despite the fact that I asked PlumpJacks directly on August 14, 2002 to send me information as soon as they had plans ready. (More on this at the end of this letter.)

Per your notice of the Draft EIR for this project, the Placer County Planning Department highlighted a number of POTENTIALLY SIGNIFICANT ENVIRONMENTAL EFFECTS ANTICPATED. Although I'm sure many of these will affect many other people, six of these will directly impact us and our enjoyment of the beauty of Squaw Valley:

- Noise
- Visual/Aesthetics
- Cultural
- Housing/population/socioeconomics
- Transportation/Circulation
- Public services

As it stands, we have a wonderful view of the mountain ridge to the North of our condo unit. The visual aesthetics will be <u>lost completely</u> if a 5-6-story giant is built. We live in San Francisco, in a vertical city Monday-Friday. Our purpose in owning a condominium in Tahoe is to escape the city and get to the simpler, more open, uncrowded setting provided in Squaw Valley.

Our North-facing windows are the only windows that we have. If a 5-6-story structure is built in that location, a large part of our ability to enjoy Squaw Valley will be lost. We understand that PlumpJacks will also be removing some of the tall, beautiful, mature trees that significantly add to the green space and the ambience in the valley.

Furthermore, there is a hot tub located in the center of the building's common lawn area facing the mountains and the proposed expansion project. We, as well as other tenants and guests enjoy sitting there in the quiet, looking at the beautiful mountains with little awareness of the present PlumpJacks units. Imagine trying to relax with an oppressive 5-6-story building and all the associated tenants looking down at you as you try to 'relax.'

A 5-6-story structure will also result in economic ramifications for those of us with obliterated views. We will certainly see our property value decline as we go from a scenic view of the mountains and tall trees to a building that blots out much of the horizon. We anticipate this could drop our property value \$50-100K. It also will translate into rental declines.

During the summer months, we often hear loud wedding parties at PlumpJacks that go on late into the night. We have to endure listening to DJs, loud, echoing voices and music until early morning. None of the units in our building are air conditioned so we always have our windows open at night. We have rarely complained about the noise pollution, except when it has been very bad. However, with added units, more people, larger parties, greater traffic circulation and generally increased congestion, we're more concerned than ever that our peaceful retreat will be shattered.

The Valley has been a quiet jewel. The proposal for a 5-6 story building is a complete deviation from the current environment. Being one or two floors more than IntraWest is simply going too far. Although PlumpJacks should have the right to add-on some units, we recommend that you limit their construction and expansion to a three story structure. This would allow us to have at least some remaining view of the mountains. It would still increase traffic, noise and congestion in the Valley, but we hope, substantially less than a 5-6-story behemoth that they currently have planned.

I'm also concerned that we have had very short notice of this project even though I asked for early notification back in August 2002 when we were closing on our purchase of our condo. I had heard PlumpJacks 'might add a floor or two.' I stopped by the PlumpJacks desk and asked about seeing the drawings or speaking to someone responsible. They said that it was not handled there, but rather back in San Francisco by the main PlumpJacks group and told me to call 415-346-8002. So on August 14, 2002 I called that number and spoke to Hillary Newsom. From the notes in my database of that conversation, Hillary told me that she was going to get more involved in marketing and that a Rob Goldberg would get in touch with me when the drawings were complete. She also indicated when I asked her about the units that they were expected to be about the same 4 floors as Intrawest. So now almost two years later I find out this is moving ahead for 5-6 floors

CK-2

CK-3

CK-4

CK-5

CK-6

and I have had almost no notice about this until now with a deadline for submitting protests by June 1, 2004.

Please place this letter in the comments part of the EIR and include me in all further notifications, discussions, planning sessions and hearings on this matter in the future. You can call, send me physical mail or email me at the contact locations below.

I appreciate your assistance in maintaining and protecting the beauty of Squaw Valley. I think it is extremely important to ensure it is not ruined by large buildings that will remove green space and obstruct entire views from neighbors, while adding more traffic and other environmental burdens on a small valley that has become over-developed.

Thank you,

Chris Kocher 2251 Green Street San Francisco, CA 94123 415-346-7307 kocher@greyheron.com

#### **Chris Kocher**

## Response CK-1

Comment noted. The County adhered to the legal notification requirements required for public review of the Draft EIR document. Also, see response MWE-3 and WS-1.

### Response CK-2

Comment noted. See response SVTCA-9, MWE-1 and WS-1.

## Response CK-3

Comment noted. See response SVTCA-2, SVTCA-3 and WS-1.

## Response CK-4

Comment noted. Noise studies prepared for the project addressed traffic-related noise, construction noise and resort-activity related noise (e.g., snow making). Other noise issues (i.e., as cited in the comment) are controlled by local regulations and policies (County General Plan, refer to pages 79-80).

## Response CK-5

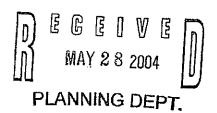
Comment noted. See response SVTCA-9, MWE-1 and WS-1.

## Response CK-6

Comment noted. Refer to comment CK-1.

Michael Wells Senior Planner Placer County Planning Department 11414 "B" Avenue Auburn, CA 95603

May 27, 2004



RE: PlumpJack Squaw Valley Inn Expansion Project

Dear Michael Wells,

We are concerned that the planned expansion of PlumpJack at 1970 Squaw Valley Road, Olympic Valley, California is not of suitable scale for the property it will be placed on and neighborhood it is being placed in. This property sits across from our unit at the Squaw Valley Lodge (201 Squaw Peak Road). The current plans are to construct a six story facility. The height of this project is a primary concern. First of all it is not consistent with the surrounding architecture, which includes two story homes, the three story Squaw Valley Lodge and the more distant four story facilities in the Village at Squaw Valley. Second, a structure of this height will block views from a number of units in the Squaw Valley Lodge. Finally, the property that this planned expansion will reside on is next to Little Squaw Creek and is relatively small compared to the Squaw Valley Lodge or the Village at Squaw Valley. We feel that a six story facility will look out of place next to Little Squaw Creek, and out of scale compared to the surrounding neighborhood.

We recommend that you do not approve the PlumpJack Squaw Valley Inn Expansion Project, unless the plans are revised to reduce the height of the addition to less than four stories.

Sincerely Yours,

Mure With

Marc Whitlow

Squaw Valley Lodge #228 201 Squaw Peak Road

Olympic Valley, CA 96146

Reetta Raag

MW-1

# Mark Whitlow And Reetta Raag

Response MW-1

Comment noted. See response SVTCA-2, SVTCA-3, SVTCA-9, SVTCA-10 and WS-1. The project scale and intensity are permitted in the *Squaw Valley General Plan and Land Use Ordinance* (see response MWE-5).

MWells @ Placer, Ca. 900 To: Mike Wells. May 28,2004

I am against the upcoming bldg.

I want to comment on the 6 story

building going up at flumpTacks.

Number one the added 34 units will create more tractic congestion to the already confertion to the vielage area, near the turn around at the Intrawests northface first Ascent DL-1 Bldg. at 1985 39 vaw Valley Road. Number two. the height of such a DL-2 structure would sreatly effect the being of the most magnificent area the area under where the tram is, a one an only 7th wonder of the world. No such structure to be , allowed. To destroy the focal point of the entire valley is unheard of there fore, please do not approve this project-Dlane Lowery phone (510) 222-0756

# **Diane Lowery**

Response DL-1

Comment noted. See response HSB-10.

Response DL-2

Comment noted. See response SVTCA-2, SVTCA-3, SVTCA-9, SVTCA-10 and WS-1.

## CHARLES G. MCKEAG

### ATTORNEY AT LAW

404 Saratoga Avenue, Suite 100 Santa Clara, California 95050

Telephone (408) 985-6071 Facsimile (408) 985-6057 P.O. Box 58171 Santa Clara, CA 95052

May 28, 2004

Michael Wells Placer County Planning Department 11414 B Avenue Auburn, CA 95603

Re: Plumpjack Expansion Project - Draft EIR

Dear Mr. Wells:

I represent a group of condominium owners whose units are located in the Squaw Valley Lodge complex, which is adjacent to the proposed site for the above-referenced project. My clients have had an opportunity to review the draft EIR for this project, and they are deeply troubled by one of the environmental impacts identified in the report.

Specifically, my clients are concerned that the proposed six-story structure will permanently destroy the views from their respective properties. In section 3.7.3 of the report, the project proponent acknowledges that the existing mountain views from Squaw Valley Lodge (which are largely unobstructed) will be "substantially altered and/or obstructed" if the project is constructed as proposed. The proponent identifies this obstruction as a "potentially significant impact" for which mitigation measures are unavailable.

CM-1

Obviously, my clients agree with the proponent's characterization of the impact; the loss of their existing view is nothing if not "significant." What troubles my clients is that the proponent is so quick to dismiss the possibility that feasible mitigation measures may exist to lessen (if not eliminate) the impact. The most obvious alternative would be to construct a building that is half the height of the proposed structure (i.e., three-stories as opposed to six). Although the proponent appears to have considered this notion in its discussion of project alternatives (see section 5.2, "Lower Intensity Alternative"), it is clear that the idea was not given serious thought.

CM-2

In section 5.2, the proponent makes the dubious claim that the adverse impact on views posed by a three-story structure would be "similar" to that posed by a six-story structure.

CM-3

My clients disagree. As acknowledged by the proponent, the proposed six-story structure will virtually, if not entirely, eliminate the mountain views my clients currently enjoy from their properties. The proposed six-story building will tower over the two-story Squaw Valley Lodge complex. In contrast, a three-story structure will be only slightly taller than my clients' property, and will still allow my clients to retain a significant portion of their existing views. In short, the severity of the impact posed by the proposed six-story structure is far greater than the lower intensity alternative so readily dismissed by the project proponent.

In light of the foregoing, my clients respectfully urge the County to restrict the expansion of the Plumpjack property to no more than three stories. This will serve the interests of my clients (and other similarly situated property owners) by protecting their existing views, while still allowing the project proponent to achieve its stated objective of providing "additional lodging for the Squaw Valley area." A smaller structure will also lessen the project's adverse impact on the existing traffic situation in the area. As the project CM-3 proponent acknowledges in the EIR, traffic is already a serious problem in Squaw Valley even without the additional impact that will be generated by this project. Therefore, we submit that rejection of the proposed six-story structure in favor of the proponent's "lower intensity alternative" is the best way to preserve the interests of my clients, the public, and the local environment

Please incorporate this letter into your collection of public comments on the draft EIR. We look forward to addressing this matter at the upcoming public hearing. In the meantime, please feel free to contact me if you have any questions or concerns about the contents of this letter.

Thank you for your courtesy and cooperation.

Very truly yours,

TOTAL FOR SENIETH BENEFIT

Charles G. McKeag

CGM/gkm

Kristen Bowes cc: Art Takaki

#### Charles G. McKeag

Response CM-1

Comment noted. See response MWE-1, SVTCA-9 and WS-1.

### Response CM-2

Comment noted. The EIR does address an alternative than considers a reduced height, and a different land use. This information will be used by the County in arriving at their decision on the project.

## Response CM-3

Development of a three-story structure will have visual implications similar to those proposed for the project, particularly regarding the building character and footprint. Clearly, a three-story structure is shorter than a six-story structure as acknowledged on page 158-159 on the Draft EIR: "Development of the project site would not substantially change the character of the existing views. The project would be integrated into existing development in a style consistent with architecture in Squaw Valley and throughout the Lake Tahoe Basin. Implementation of the Lower Intensity alternative would only incrementally alter views of the mountains from areas adjacent to the project site although this impact would be less than under the proposed project. Like the proposed six-story structure, views from existing residential development would be substantially altered or obstructed with this alternative, although to a lesser extent due to the lower structure height."

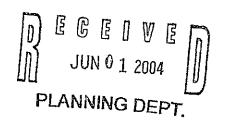
Response CM-4

Comment noted. See response CM-2.

May 28, 2004

Kenneth & Irene Wong 201 SQUAW PEAK ROAD, UNIT 154 OLYMPIC VALLEY, CA 96146

Phone: 408-390-0640



Placer County Planning Department

Attention: Ms. Lori Lawrence

11414 B Avenue Auburn, CA 95603

Re: PlumpJack Squaw Valley Inn Expansion Project, APN 096-020-023

## Dear Ms. Lawrence:

We have a unit across the way from the PlumpJack Squaw Valley Inn and are very concern about their expansion project. Some of our main concerns are as follows:

 The proposed 6 stories are too high and will block some of the views of the valley. Keeping the height of the building to the same height as the surrounding buildings like Squaw Valley Lodge should be consider.

KIW-1

 Are their sufficient parking and open space with the increase density and traffic?

KIW-2

• Will the new structure impact the look and feel of our existing environment?

KIW-3

Please consider the impact of this expansion relatively to the totality of surrounding conditions. We urge the planning department to review the proposal carefully.

Thank you for your time and appreciate your attention to this matter.

Sincerely,

Kenneth & Irene Wong

# Kenneth & Irene Wong

Response KIW-1

Comment noted. See response MWE-1, HSB-2, SVTCA-2, SVTCA-3, SVTCA-9 and WS-1.

Response KIW-2

Comment noted. See response RL-2 (parking). The project scale and intensity are permitted in the *Squaw Valley General Plan and Land Use Ordinance* (see response MWE-5).

Response KIW-3

Comment noted. See response HEL-5.

JUDITH AND BRAD O'BRIEN 1655 Bay Laurel Dr. Menlo Park, CA 94025

May 27, 2004

Placer County Planning Dept. 11414 B Ave. Auburn, CA 95603

Re: Plumpjack Squaw Valley Inn Development

Ladies and Gentlemen:

We are the owners of Unit 805 at the Squaw Valley Lodge and are concerned about the height of the proposed development by PlumpJack Squaw Valley Inn. A six story building will not only block our view, it will not fit in to the development at Squaw Valley. We strongly urge you to require that the development not exceed three stories.

JB-1

Yours truly,

Judy and Brad O'Brien

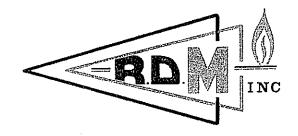
JUN 0.1 2004

PLANNING DEPT.

# Judith and Brad O'Brian

Response JB-1

Comment noted. See response MWE-1, SVTCA-2, SVTCA-3, SVTCA-9 and WS-1.



# R.D. Miners Inc.

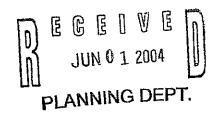
401 Parr Blvd.

Richmond, CA 94801 Toll Free: 800-4-Boiler

(415) 236-4972

26 May, 2004

Michael Wells, Senior Planner Placer County Planning Department 11414 B Avenue Auburn, California 95603



# Ref. Plumpjack Expansion

Dear Mr. Wells,

I am an owner of a unit at Squaw West. I do not believe a 6-story Hotel on Squaw Creek Road is in our best interest. My reasons are:

- Traffic is fine now, but a Hotel would add a great deal of congestion.

  (We have grand children that play on that road now)

  RW-1

  A 6-story Hotel would make our road like a street in San Francisco.
  That is not appropriate for our Squaw Valley area.

  RW-2

  A 6-story Hotel would change the views and the openness of our area, ie access to Squaw Creek, etc.

  RW-3

  When I purchased our unit, in one of the closets, there was a complete set of
- When I purchased our unit, in one of the closets, there was a complete set of plans for a large hotel just to the right of our unit. Fortunately, it was not built.

  RW-4
  I hope this 6-story Hotel is not built.

Is there a website that shown this 6-story Hotel?

Russ Westover

## **Russ Westover**

Response RW-1

Comment noted. See response HSB-10. The project applicant is proposing condominiums, not a hotel.

Response RW-2

Comment noted. See response MWE-1 and WS-1.

Response RW-3

Comment noted. See response MWE-1, SVTCA-9, and WS-1.

Response RW-4

Comment noted. No response necessary.

#### JOHN AND CONNIE WONG

201 SQUAW PEAK ROAD, UNIT 226/107 OLYMPIC VALLEY, CA 96146

MAY 28, 2004

JUN 0 1 2004

PLANNING DEPT

Placer County Planning Department Attention: Ms. Lori Lawrence, Planning Technician Auburn, CA 95603

Re: PlumpJack Squaw Valley Inn Expansion Project, APN 096-020-023
Publish Date: April 22, 2004, Tahoe World

Dear Ms. Lawrence:

I am writing to express our concerns about the PlumpJack Squaw Valley Inn Expansion Project. My wife and I own 2 condos in Squaw Valley Lodge. We do have some concerns regarding this project.

- (1) Six stories is way too tall and is not consistent with the surrounding buildings like Squaw Valley Lodge and the other condo's or homes located down the road.

  JW-1
- (2) With the increased number of units at PlumpJack, will the existing roadway be sufficient to handle the increased traffic?
- (3) There be nuisances such as increased noise due to delivery entrances, eyesores such as garbage containers, etc.
- (4) We feel that with the Expansion of the village and condos that are currently being built it's already over congested.

My wife and I have spoken to a number of owners, who have also expressed the same concerns about PlumpJack's expansion. Should you need any additional questions or clarification about our concerns, please do not hesitate to contact me at (408) 813-1664.

Thank you for your attention on this matter.

Sincerely,

John Wong

# John And Connie Wong

Response JW-1

Comment noted. See response MWE-1, SVTCA-2, SVTCA-3, SVTCA-6 and WS-1.

Response JW-2

Comment noted. See response HSB-10.

Response JW-3

Comment noted. See response HSB-2.

Response JW-4

Comment noted. No response necessary.

# James A Schuyler Kathryn Goldman Schuyler

(415) 242-2424 Mailing address: 220 Palo Alto Avenue, San Francisco CA 94114 FAX 415.681.6493



1 June, 2004
Regarding Plump Jack Expansion
APN 096-020-023

Mr. Michael Wells, Senior Planner Placer County Planning Department

In regard to the expansion of **PlumpJack Squaw Valley Inn**, we believe that the construction of tall, dense structures in the valley is inappropriate. We urge you to restrict new structures to a two-stories over parking, or to a three-stories over underground parking format, such as that of **Squaw Valley Lodge**. Appropriate setbacks from roads and from Squaw Creek must also be observed.

JAS-1

The ombiance of the valley is still fairly countrified – with larger structures set back from approaches and roads (such as **The Inn At Squaw Creek**) and although **First Ascent/The Village** stands out as differing from the quality of the rest of the valley, we should not continue this precedent by adding more tall buildings.

A village is one thing, but we don't want a city with high-rise buildings, congested traffic and more urban problems.

In addition to being aesthetically inappropriate for the valley, we are concerned about the increased load on water resources, strain on other utilities, and additional noise and traffic flow.

Condominium owners are not always full-time residents, but we do spend a lot of time here, and we value our time at Olympic Valley/Squaw Valley highly. We feel we're a part of a community, and we urge you to consider this input in your hearings and deliberations.

James Schuyler

James A. and Kathryn Schuyler, owners of unit 253 at Squaw Valley Lodge, 201 Squaw Peak Road, Olympic Valley CA

# James A. and Kathryn Schuyler

Response JAS-1

Comment noted. See response MWE-1 and WS-1. Refer to responses HSB-8 and SVSC-8 regarding the County's consideration of the variance request.

Mr. Michael Wells, Sr. Planner Placer County Planning Department 11414 "B" Avenue Auburn, California 95603

Re: PlumpJack Squaw Valley Inn Draft EIR Olympic Valley, California

Dear Mr. Wells,

We are in receipt of the above Draft EIR. We are the owners of the end unit 705 (ground floor) of Squaw Valley Lodge. Our unit faces directly towards the proposed six (6) -story additions to PlumpJack. Based on the proposal impeding our view of the mountain (cannot be mitigated), additional traffic (level of service-cannot be mitigated), additional construction disruption and noise (pre and post), encroachment into the 100-year flood plain, setback variances (needed to maximize the use of the PlumpJack property-cannot be mitigated), creating impervious drainage storage areas and the likely reduction in value of our property we are not in favor of this project and we request that there proposal be turned down.

Thank you,

John Massey

JM-1

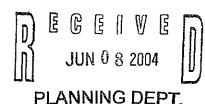
## John Massey

Response JM-1

Comment noted. Refer to response MWE-1, SVTCA-9, SVTCA-10, and WS-1 regarding the views. Refer to response HSB-10 regarding traffic. Refer to CK-4 regarding noise concerns. Refer to responses SVSC-8 and HSB-8 regarding the County's consideration of the setback variance request. Additional impervious surfaces will be created however the additional runoff generated will be accommodated within the storm drain plan. The habitable portion of the project will not encroach into the 100-year floodplain. Improvements to the damaged creek bank are proposed to stabilize the bank and will encroach into the 100-year floodplain.

### DEPARTMENT OF TRANSPORTATION

DISTRICT 3, SACRAMENTO AREA OFFICE Venture Oaks -MS 15 P.O. BOX 942874 SACRAMENTO, CA 94274-0001 PHONE (916) 274-0638 FAX (916) 274-0648 TTY (530) 741-4509 Flex your power! Be energy efficient!



June 2, 2004

04PLA0023 SCH #2001122074 Plumpjack Squaw Valley Inn Expansion Project Draft Environmental Impact Report 03PLA089 PM 13.720

Ms. Lori Lawrence Placer County Planning Department 11414 B Avenue Auburn, CA 95603

Dear Ms. Lawrence:

Thank you for the opportunity to comment on the Plumpjack Squaw Valley Inn Expansion Project. Our comments are as follows:

- This project by itself will add some traffic demand to existing congested conditions on State
- Route (SR) 89 on peak winter days, but the increase should not be noticeable on the highway.
- It should be noted that in Table 3.12.A, the values listed for the Truckee River Bridge on SR 89 are not correct. The values shown are for SR 89 near the Caltrans' Tahoe City CT-2 Maintenance Station, which has higher volumes than the segment between Squaw Valley Road and Alpine Meadows Road.
- The document, in text, appears to address concerns regarding potential project impacts related to increases in surface water (storm water) runoff and water quality adequately. However, we would like to receive the plans, drawings, and calculations that substantiate the text.
- Several sections of the text indicate post-project runoff will be "...reasonably the same as..." pre-project runoff. One example of this text is found at Item 4.E.11 (pg 49). Only Impact FC-2 (pg 51) has text that actually states "...new drainage facilities will have the same or slightly lower peak discharge rate during a 2, 10, 25 and 100-year storm as the existing facilities." This is the appropriate level of mitigation required to avoid impacts to the State's highway right of way and Caltrans' highway drainage facilities.
- The Item 4.F.1 (pg 49), as it reads, is intended to address site accessibility during the 100-year return storm event. The response inaccurately addresses project impacts to the 100-

CT-5

CT-1

CT-3

Ms. Lori Lawrence June 2, 2004 Page 2 of 2

year floodplain. There is a significant difference between the 100-year return storm event and the 100-year floodplain. Even sites on considerable high ground are subject to the impacts of the 100-year return storm event. This article is intended to insure accessibility, particularly for emergency response purposes, during significant storm events when many streets may be temporarily inundated. This article proposes that arterial roads and expressways be passable even during the 100-year return storm event.

• The last two sentences of the last paragraph on page 51 indicates a final drainage report including plans, drawings and calculations will be prepared as part of the final project design and that this report with plans, calculations, and hydrology report will be sent to Caltrans. We look forward to receiving these documents for review and comment.

CT-6

Please provide Caltrans with a copy of any further actions for this project. If you have any questions regarding these comments, please contact Cathy Chapin at (916) 274-0640.

Sincerely,

JEFFREY PULVERMAN, Chief Office of Regional Planning

c: State Clearinghouse

#### Caltrans, Jeffrey Pulverman

#### Response CT-1

Comment noted. The traffic consultant (LSC) conducted a traffic impact analysis for the project and confirmed this conclusion. Regardless, under year 2010 cumulative conditions, the Squaw Valley Road/SR-89 intersection will exceed the County's standards for level of service.

#### Response CT-2

The traffic study text and Table 3.12.A will be revised accordingly.

#### Response CT-3

Preliminary drainage plans for the project can be obtained from the Placer County Public Works Department.

#### Response CT-4

Comment noted. All references to post-project runoff will be written as, "The new drainage facilities will be designed to have the same or slightly lower peak discharge rate during a 2, 10, 25, and 100-year storm as the existing facilities.

The language in 4.E.9, 4.E.11, and Mitigation Measure FC-2a was changed from "The project will provide drainage attenuation facilities that will result in post project outflows that are reasonably the same as pre-project outflows for the 2, 10, 25, and 100-year storm" to "The new drainage facilities will be designed to have the same or slightly lower peak discharge rate during a 2, 10, 25, and 100-year storm as the existing facilities."

#### Response CT-5

The italicized text in item 4.F.1 on page 49 has been changed from "The project is not proposing any development of the expansion project within the 100-year floodplain of Squaw Creek except bank stabilization as a restoration effort along Squaw Creek to "The project is not proposing any development that would impact arterial roadways and expressways, residences, commercial and industrial uses, or emergency facilities during a 100-year storm event."

#### Response CT-6

Placer County Public Works Department will provide Caltrans with the final drainage plans in conjunction with final project design.